

Telephone: 01324 696455 Fax: 01324 696444
E-mail: brian.archibald@scotland.gsi.gov.uk



Richard Greenwood
East Renfrewshire Council
Environment Department
2 Spiersbridge Way
Spiersbridge Business Park
Thornliebank
Glasgow
G46 8NG

Our ref: LDP-220-2

22 January 2015

Dear Richard

**EAST RENFREWSHIRE PROPOSED LOCAL DEVELOPMENT PLAN
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 plan. Having satisfied ourselves that the council's consultation and engagement exercises conformed with their participation statement, our examination of the plan commenced on 23 June 2014. We have completed the examination, and now submit our report, enclosing one bound and one unbound copy.

In our examination we considered all 45 issues arising from unresolved representations which were identified by the council. In each case we have taken account of the summaries of the representations and the responses, as prepared by the council, and the original representations. We have set out our conclusions and recommendations in relation to each issue in our report.

The examination process also included a comprehensive series of unaccompanied site inspections and, for some issues we requested additional information from the council and other parties. On 23 June 2014 Scottish Ministers published National Planning Framework (NPF) 3 and updated Scottish Planning Policy (SPP). Where necessary, we invited parties to comment on the implications, if any, of these publications for the matters under consideration in the examination. We have taken account of the new Scottish Planning Policy and National Planning Framework 3 in our report where appropriate, together with any related responses from the parties. Any references to these documents in our conclusions refer to the updated versions unless otherwise stated.



We would like to thank the council and other parties for the prompt and helpful responses received where we did request additional information. 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 and in the Town and Country Planning (Grounds for Declining to Follow Recommendations) (Scotland) Regulations 2009, the council is now required to make the modifications to the plan as set out in our recommendations.

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

A letter will be issued to all those who submitted representations to inform them that the examination has been completed and that the report has been submitted to the council. It will advise them that the report is now available to view at the DPEA website at:

<http://www.dpea.scotland.gov.uk/CaseDetails.aspx?id=115072>

and at the council's office at

Council Headquarters
Eastwood Park
Rouken Glen Road
Giffnock
East Renfrewshire
G46 6UG

Council Offices
211 Main Street
Barrhead
East Renfrewshire
G78 1SY

Council Offices
2 Spiersbridge Way
Spiersbridge Business
Park
Thornliebank
G46 8NG

and that it will also be posted on the council's website at:

<http://www.eastrenfrewshire.gov.uk/local-development-plan>

and a hard copy will be available for viewing in the following libraries:

Barrhead Community Library
14 Lowndes Street
Barrhead
East Renfrewshire
G78 2QX

Busby Library
Main Street
Busby
East Renfrewshire
G76 8DX

Clarkston Community Library
Clarkston Road
Clarkston
East Renfrewshire
G76 8NE

Eaglesham Community Library
Montgomerie Hall
Eaglesham
East Renfrewshire
G76 0LH

Giffnock Community Library
Station Road

Mearns Community Library
Mackinlay Place

Giffnock
East Renfrewshire
G46 6JF

Newton Mearns
East Renfrewshire
G77 6EZ

Neilston Library
Main Street,
Neilston
East Renfrewshire
G78 3NN

Netherlee Community Library
Netherlee Pavillion
Linn Park Avenue
Netherlee
East Renfrewshire
G44 3PG

Thornliebank Library
1 Spiersbridge Road
Thornliebank
East Renfrewshire
G46 7SJ

Uplawmoor Community Library
Mure Hall
Tannoeh Road
Uplawmoor
East Renfrewshire
G78 4AD

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

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,

Katrina Rice
REPORTER

Michael Cunliffe
REPORTER

Richard G Dent
REPORTER

EDK Thomas
REPORTER

REPORT TO EAST RENFREWSHIRE COUNCIL

EAST RENFREWSHIRE PROPOSED LOCAL DEVELOPMENT PLAN EXAMINATION

Reporters: Katrina Rice BSc (Hons) DipTP MRTPI
Michael Cunliffe BSc(Hons) MSc MCIWEM
Richard G Dent BA(Hons) DipTP FRTPI
Dilwyn Thomas BSc(Hons) MBA MRTPI

Date of Report: 22 January 2015

CONTENTS**Page No**

Examination of Conformity with Participation Statement

1

Issue

1	General	3
2.1.1	Strategic Vision and Objectives	20
2.1.2	Development Strategy	25
2.2	Strategic Policy 2 Assessment of Development Proposals	47
2.3	Development Contributions	58
3.1	Master Plans	64
3.2	Master Plan M77 Strategic Development Opportunity	69
3.3	Master Plan Malletsheugh-Maidenhill Newton Mearns	96
3.4	Master Plan Barrhead South Springhill, Springfield, Lyoncross	125
3.5	Master Plan Shanks - Glasgow Road Barrhead	151
3.6	Master Plan Braidbar Quarry	163
3.7	Master Plan Drumby Crescent	166
3.8	Regeneration Issues	171
3.9	Rural Issues Policy M7 Rural Settlements	174
3.10	Neilston Village Regeneration	179
4	Greenbelt	213
4.1	Green Network and Natural Environment	219
4.2	Outdoor Access	237
5	Detailed Guidance for all Development	242
6	Built Heritage	249
7	Community, Leisure and Educational Facilities	259
8	General Development Management Policies	286
9.1	Housing Supply Delivery and Distribution	291
9.1.1	Housing Supply Barrhead	307
9.1.2	Housing Supply Busby	321
9.1.3	Housing Supply Giffnock	326
9.1.4	Housing Supply Newton Mearns	330

9.1.5	Housing Supply Uplawmoor	340
9.1.6	Housing Supply Waterfoot	344
9.2.1	Submitted Housing Supply Barrhead	345
9.2.2	Submitted Housing Supply Busby	350
9.2.3	Submitted Housing Supply Clarkston	356
9.2.4	Submitted Housing Supply Eaglesham	361
9.2.5	Submitted Housing Supply Newton Mearns	371
9.2.6	Submitted Housing Supply Uplawmoor	390
9.2.7	Submitted Housing Supply Waterfoot	395
10	Affordable Housing and Housing Mix	400
11	Economic Development	412
12	Town and Neighbourhood Centres	422
13	Sustainable Transport Network	434
14	Renewable Energy	445
15	Energy Efficiency	459
16.1	Water Environment and Flooding	463
16.2	Waste	476
17	Technical Documents	479

Examination of conformity with the participation statement

Introduction

1. Section 19(4) of the Town and Country Planning (Scotland) Act 1997 (as amended) states that the person appointed to examine a proposed local development plan “is firstly to examine under this subsection the extent to which the planning authority’s actions with regard to consultation and the involvement of the public at large as respects the proposed plan have conformed with (or have been beyond the requirements of) the participation statement of the authority which was current when the proposed plan was published under section 18(1)(a).”

Participation statement

2. The March 2012 Development Plan Scheme (CD/52B submitted by the council on 20 June 2014) contained the participation statement current when the proposed East Renfrewshire Local Development Plan was published. The development plan scheme was published again in March 2013 and March 2014 and contained updated details on progress and timescales and updated versions of the participation statement.

3. The participation statement set out “who” would be involved in plan preparation, “how” they could get involved and what “feedback” would be provided after each consultation period. Each development plan scheme divided the production of the local development plan into 10 main stages and for each stage provided a table giving more details of how and when anyone could become involved. The minimum consultation requirements of Circular 1/2009 were set out together with further consultation methods which the council aimed to use. Other options/methods to consider were also listed.

Report of conformity with the participation statement

4. The council’s report of conformity with the participation statement was submitted with the proposed local development plan, in accordance with section 18(4)(a)(i) of the Act. The report focuses on 3 key consultation stages, the main issues report, proposed plan and modifications stages with a full breakdown of all of the plan preparation stages in an appendix. The report provides a summary of the participation methods used by the council to fulfil the aims of the participation statement. It sets out chronologically the methods and events used in engagement. There is particular emphasis on those methods that go beyond the minimum consultation requirements such as:

- A 16 week consultation period for the main issues report rather than the 6 week minimum
- A 12 week consultation period for the proposed local development plan rather than the 6 week minimum
- Drop-in sessions – 4 held at local libraries
- Forums involving developers, councillors, community councils, agents and the wider public
- Use of Planning Aid
- Publications – East Renfrewshire magazine and a Local Development Plan Newsletter
- Social media – use of council Facebook and Twitter accounts
- Posters and leaflets in council offices, libraries, other public buildings and local supermarkets
- Public exhibitions – display boards in libraries and digital TV screens in public buildings

- Neighbour notification – widened to 200 metres rather than the minimum 20 metres

5. Evidence in the form of posters, leaflets and newsletters are contained in appendices. The report of conformity concludes that it “illustrates the extent of the measures that the council has put in place to ensure an appropriate level of engagement and demonstrates that the council has significantly exceeded the minimum requirements.” Following my further information request, the council also provided a copy of the document “Better Community Engagement: A Framework for East Renfrewshire Council” which was referred to in their 2012 development plan scheme and explained more fully how they had undertaken the following:

- Worked closely with the council’s Engagement Team
- Involved previously underrepresented groups
- Made the process of providing responses to the proposed plan as simple as possible
- Provided feedback on the result of any consultation process

The reporter’s conclusions

6. Some representations to the proposed plan refer to a lack of engagement on the part of the council (see Issue 1 – General). However, the council has in my view, achieved what it set out to do in its participation statement and has complied with the legal requirements. Having considered all of the information provided, I find that the council has conformed with its participation statement and has in many cases exceeded minimum consultation requirements with regard to consultation and the involvement of the public at large as envisaged by Scottish Ministers.

7. I am satisfied that it is not necessary for me to submit a report to Ministers under section 19A(1)(b) of the Act. I will therefore proceed with the examination of the proposed local development plan.

Katrina Rice
Reporter

23 June 2014

Issue 1	LOCAL DEVELOPMENT PLAN GENERAL	
Development plan reference:	Chapter 1 – Sections 1.1 – 1.10.2	Reporters: Katrina Rice (consultation issues) Michael Cunliffe (other issues)
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Ian Davidson (Ref 9/1) (Ref 9/6) Scottish Parliament (Ref 25/1) The Coal Authority (Ref 59/1) SEPA (Ref 70/6) (Ref 70/56) James Whyteside (Ref 82/1) (Ref 82/3) (Ref 82/18) Coriolis Energy Ltd (Ref 99/3) Robert Johnston (Ref 131/6) (Ref 131/7) Norman Gray (Ref 214/4) Margaret Gray (Ref 231/6) RSPB Scotland, South and West Region (Ref 280/1) Norman Graham (Ref 286/1) Caroline Viney (Ref 308/2) Dr Brian Robson (Ref 345/2) (Ref 345/4) Margaret Hamilton (Ref 348/1) (Ref 348/2) Cala Homes and Taylor Wimpey (Ref 378/2) Ian Gladstone (Ref 380/1) (Ref 380/6) East Renfrewshire Green Belt (Newton Mearns) (Ref 463/4) Confederation of UK Coal Producers (CoalPro) (Ref 472/1) John Muchan (Ref 492/2) Aardvark TMC Ltd (trading as ATH Resources) (Ref 503/1) Thornliebank Community Council (Ref 504/2) Alistair Fyfe (Ref 541/1) Christine Woods (Ref 586/3) Ishbel C Woods (Ref 587/3)</p>	<p>Aileen M Fyfe (Ref 599/1) James Sandeman (Ref 600/1) Charlie McGeever (Ref 653/1/) (Ref 653/3) Link in consultation with Barrhead, Arklet and Hanover Housing (669/1) Eugene Kelly (Ref 671/2) (Ref 671/3) Glasgow Jewish Representative Council (Ref 722/2) Jules McGeever (Ref 744/1) Norman Oliver (Ref 764/2) Robert Caldwell (Ref 774/4) D Jesner (Ref 783/2) (Ref 783/3) John W Kilmurray (Ref 798/2) Evelyn Muchan (Ref 811/1) T D West (Ref 848/2) Iain McCowan (Ref 896/1) (Ref 896/5) (Ref 896/12) Barrhead Community Council (Ref 924/2) (Ref 924/8) Auchenback Tenants and Residents Association (Ref 938/2) (Ref 938/8)</p> <p><u>Appendix 1 – Standard Letters</u> Standard Letter Comment 1.1A (2 reps) (Ref 984/1) Standard Letter Comment C01A (17 reps) (Ref 985/1) Standard Letter Comment PMA (4 reps) (Ref 997/1) Standard Letter Comment PMB (13 reps) (Ref 998/1)</p>	
Provision of the development plan to which the issue relates:	Chapter 1: Foreword 1.6 Regional Policy 1.8 Habitats Directive 1.10 Supplementary Planning Guidance	
Planning authority's summary of the representation(s):		
<p><u>(a) General Comments</u></p> <p><u>Objections</u></p> <p><u>Ian Davidson (Ref 9/6)</u> - My overall concern is that the public are being asked to approve</p>		

something which is very general and by the time specific proposals emerge it will be too late to make any significant difference.

The Coal Authority (Ref 59/1)

Resources:

Northern part of East Renfrewshire contains coal resources which are capable of extraction by surface mining operations. The Coal Authority is keen to ensure coal resources are not unduly sterilised by new development prior to the extraction of coal.

Legacy:

93 recorded mining entries and other coal mining hazards recorded in East Renfrewshire LDP needs to recognise these areas when proposing new development.

Policy omission - Minerals

There are coal resources present in the north of the LA area that are capable of extraction

GIS data previously submitted to the council shows these

LDP should cover the issue of mineral planning with policy in place to meet the requirements of the SPP

This should include areas of search and highlight opportunities for extraction prior to sterilization and identify opportunities for Coal Bed Methane extraction.

At the very least readers of the LDP should be directed to the section in the SDP on minerals.

SEPA (Ref 70/6)

Object to lack of inclusion of specific policy to address air quality.

An alteration to strengthen the plan and allow us to remove our objection in line with national planning policy, guidance and advice, would be:

1) Reference to air quality as a significant issue for the Council.

2) The inclusion of a specific policy (linked to supplementary planning guidance if available) to address air

quality issues which requires that an air quality assessment is undertaken for all proposed developments which may give rise to incidences of specific air quality objectives, resulting in the need for an Air Quality Management Area. This policy should address the effects of individual and cumulative developments on air quality.

Confederation of UK Coal Producers (CoalPro) (Ref 472/1)

No reference to coal or other minerals

Shallow coal could be extracted by surface mining methods in ER

Paras 239 to 247 of SPP should be included in LDP to address issues:

Safeguarding of shallow coal resources to avoid unnecessary sterilisation also including the principle of prior extraction of resources in urban areas.

Support of the principle of prior extraction in relation to redevelopment in urban areas especially if this also represents the most efficient and economic method of ground stabilisation.

Policies to deal with proposals to extract minerals, including surface coal.

Aardvark TMC Ltd (trading as ATH Resources) (Ref 503/1)

Object to lack of reference to coal or other minerals in direct contrast to SPP

ER has reserves of shallow coal and must accept the availability of this resource

Policy should be included with the requirements set out in paras 239 to 247 of SPP

Surface coal mining is an important industry in Scotland providing high levels of employment and pay

Complete withdrawal of any minerals based policies can affect the potential growth of the ER economy

Standard Letter Comment 1.1A (2 reps) (Ref 984/1) - Concern over lack of detail in plan, at SPG stage it will be hard to comment on.

(b) Consultation and Layout Issues

Support

Norman Gray (Ref 214/4) - Consultation information and events have been good.

Margaret Gray (Ref 231/6) - Pleased with consultation event at Clarkston Library and glad ERC made an effort to listen.

John W Kilmurray (Ref 798/2) - Found consultation/drop-in session to be informative and useful.

Objection

Ian Davidson (Ref 9/1)

Difficult for the 'layman' to understand 'technocratic' documents.
More direct consultation process with public meetings would have been helpful.
Most people are unaware of what is going on until it is too late to make any meaningful comment contribution.
Consultation is too remote.

Scottish Parliament (Ref 25/1) - Letters of objection limited to 2000 words seems unfortunately bureaucratic.

James Whyteside (Ref 82/1)

LDP consultation inadequately publicised and fails to apply best practice for a major consultation exercise and fails to make clear the consequences of the policies
LDP is a dense and opaque document.
Views expressed during the MIR consultation have been ignored.

Robert Johnston (Ref 131/6)

Consultation poor
number of documents hard to understand
Events inadequate

Norman Graham (Ref 286/1) - Considered Drop-in session unhelpful and feels that having polled residents attending that they felt it was unhelpful also.

Dr Brian Robson (Ref 345/4)

Insufficient consultation
Planning Committee Councillors not attending meetings
Newton Mearns Council not part of formal consultation process

Margaret Hamilton (Ref 348/1)

Insufficient information for residents to understand what is happening
Drop in session vague

Councillors did not attend public meetings
Too many aspects of plan that have not been discussed

Ian Gladstone (Ref 380/1) - Poor Councillor attendance at consultation events

John Muchan (Ref 492/2) - Unacceptable consultation process, lack of publicity/profile, refusal of authority to attend meetings

Alistair Fyfe (Ref 541/1) - Proposals difficult to understand. Complicated documents and structure.

Christine Woods (Ref 586/3) - Poor publicity of consultation. Maps unclear

Ishbel C Woods (Ref 587/3) - Poor publicity of consultation. Maps unclear

Aileen M Fyfe (Ref 599/1) - Proposals difficult to understand, complicated documents and structure.

Charlie McGeever (Ref 653/1)

Consultation not sufficient
Council refused to attend public meetings
Notification process pre-LDP consultation not satisfactory

Link in consultation with Barrhead, Arklet and Hanover Housing (Ref 669/1)

Difficult to read
Layout not user friendly
Settlement strategies should be grouped together like Falkirk's Local Plan

Eugene Kelly (Ref 671/2) - Lack of consultation

Glasgow Jewish Representative Council (Ref 722/2)

Not aware that any consultation has taken place with individuals or organisations representing the Jewish Community and no approach was made to this Representative Council or the Scottish Council for Jewish Communities (SCoJeC) for statistical information.

Jules McGeever (Ref 744/1)

Undemocratic approach to the plan
Letters and maps sent through Neighbour Notification process almost impossible to understand
Lack of consultation
Lack of pre-information on site selection

Robert Caldwell (Ref 774/4) - Should not proceed without full community support

D Jesner (Ref 783/3)

Consultation:
Delay in hard copies of all 26 documents being available
ERC deliberately refused to engage with the concept or ethos of public participation
Refused to attend to present plans to Community Councils
Planners only attended area forums for a short time (18 mins)
Refused to hold a public meeting

Consultation not well promoted on website
Officers misled councillors by reporting high levels of satisfaction with drop-in sessions
Mail server issues
Did not give all community councillors a full copy of LDP
Councillors and ERC Officials refused to attend joint Community Council meeting on the plan

Evelyn Muchan (Ref 811/1) - Lack of consultation with local residents and in particular the apparent local authority refusal to attend public meetings.

T D West (Ref 848/2)

Unacceptable lead time for people to respond to consultation
Documents not aimed at public just to satisfy that they legally have been publicised
Page numbers etc requested on Response Form not in Summary Document
Litigious documents lacking in plain language

Iain McCowan (Ref 896/1) (Ref 896/12)

(Ref 896/1) : LDP should be redrafted in entirety
(Ref 896/12): Advised LDP would be reduced from MIR but is now 26 documents
Non attendance at public meetings
Questions not clearly answered at drop ins

Barrhead Community Council (Ref 924/8) - Not user friendly

Auchenback Tenants and Residents Association (Ref 938/8) - Not user friendly

Standard Letter Comment C01A (17 reps) (Ref 985/1)

Unnecessary amount of documents make it difficult for residents to understand and are repetitive.
Consultation inadequate.
New consultation process started when new documents (as per other comments) are completed. Information delivered to residents homes. Full attendance at public meetings

(c) Proposals Map

Objection

James Whyteside (Ref 82/18) - completely unreadable maps

Coriolis Energy Ltd (Ref 99/3) - Legend is not coherent e.g. South of Barrhead

Robert Johnston (Ref 131/7) - Maps hard to understand

Caroline Viney (Ref 308/2) - All sites in green. Difficult to read

Dr Brian Robson (Ref 345/2)

Difficult to read
Are there standards that have to be adhered to?
Use of greens confusing

Margaret Hamilton (Ref 348/2) - Overuse of green in an effort to appear environmentally friendly.

Cala Homes and Taylor Wimpey (Ref 378/2) - Proposals Map indicates all non-residential uses to be accommodated on Maidenhill site. Policy M2.1 indicates these are to be spread throughout the sites.

Ian Gladstone (Ref 380/6) - Maps poor and difficult to engage with

Thornliebank Community Council (Ref 504/2) - Not easy to follow

Charlie McGeever (Ref 653/3) - Maps poor, hard to understand

Eugene Kelly (Ref 671/3) - Poor maps

Norman Oliver (Ref 764/2) - Difficult to read

D Jesner (Ref 783/2) – Colours. Difficult to read. No named landmarks/roads etc.

Barrhead Community Council (Ref 924/2)

Proposals not clearly illustrated

Use of colours poor

Use of codes difficult to understand

Auchenback Tenants and Residents Association (Ref 938/2)

Proposals not clearly illustrated

Use of colours poor

Use of codes difficult to understand

Standard Letter Comment PMA (4 reps) (Ref 997/1)

Map is too difficult to use

It does not feature known landmarks to aid navigation

It was too ambitious that the map could convey 1000 pages of written information

People cannot understand master planning process from the map

Failure of maps as they compress too many proposals and concepts onto each map.

Standard Letter Comment PMB (13 reps) (Ref 998/1) - Failure of maps as they compress too many proposals and concepts onto each map.

(d) Regional Policy

Objection

James Whyteside (Ref 82/3) - What has ERC done about encouraging other Council's to address their own shortcomings.

Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/4)

Section on SDP policy framework too short for key overarching document

Section 2 of the Monitoring Statement gives more detail but is not cross-referenced in text

Monitoring statement conforms no SDP requirement for large scale strategic land release to meet housing targets

(e) Habitats Directive**Objection**

RSPB Scotland, South and West Region (Ref 280/1) - New section added after Section 1.8 to refer to the requirements of The Environmental Assessment (Scotland) Act 2005 and cross reference to the Environmental report to highlight this as a key requirement that has influenced the LDP.

(f) Supplementary Planning Guidance**Objections**

SEPA (Ref 70/56) - Consider specific pressures on the water environment that might be exacerbated or addressed by proposed development including sites where a buffer strip would be required and also potential opportunities for restoration. We would expect these recommendations and any existing pressures to be considered through the planning application process or through the production of detailed Development Briefs. At the LDP stage the most appropriate way to ensure these recommendations are taken into account through the planning application process is the inclusion of policies which refer to the water environment such as Policies E3 and E5 of East Renfrewshire Council's draft LDP. You may also wish to consider producing supplementary planning guidance regarding buffer strip and restoration requirements, this could highlight sites where buffer strips will be required.

James Sandeman (Ref 600/1) - SPGs are historically produced to enlarge on topics already included in the Plan. Their content at this early stage should therefore be integral to the Plan, not a never-ending series of supplements.

Iain McCowan (Ref 896/5)

Object to additional guidance should be incorporated into LDP

No justification for additional SPGs, these should be incorporated into document

Modifications sought by those submitting representations:**(a) General Comments – New Policy Requests**

The Coal Authority (Ref 59/1), Confederation of UK Coal Producers (CoalPro) (Ref 472/1), Aardvark TMC Ltd (trading as ATH Resources) (Ref 503/1) - Inclusion of policies to deal with the extraction of minerals.

SEPA (Ref 70/6) - Inclusion of specific policy to address air quality.

Ian Davidson (Ref 9/6), Standard Letter Comment 1.1A (2 reps) (Ref 984/1) - These representations stated that all information should be included within the Plan and not in Supplementary Planning Guidance.

(b) Consultation and Layout Issues

Ian Davidson (Ref 9/1), Scottish Parliament (Ref 25/1), James Whyteside (Ref 82/1), Robert Johnston (Ref 131/6), Norman Graham (Ref 286/1), Dr Brian Robson (Ref 345/4), Margaret Hamilton (Ref 348/1), Ian Gladstone (Ref 380/1), John Muchan (Ref

492/2), Alistair Fyfe (Ref 541/1), Christine Woods (Ref 586/3), Ishbel C Woods (Ref 587/3), Aileen M Fyfe (Ref 599/1), Charlie McGeever (Ref 653/1), Eugene Kelly (Ref 671/2), Jules McGeever (Ref 744/1), Robert Caldwell (Ref 774/4), D Jesner (Ref 783/3), Evelyn Muchan (Ref 811/1), T D West (Ref 848/2), Iain McCowan (Ref 896/1) (Ref 896/12), Barrhead Community Council (Ref 924/8), Auchenback Tenants and Residents Association (Ref 938/8), Standard Letter Comment C01A (17 reps) (Ref 985/1) - These representations objected to the publicity and presentation of the Proposed Local Development Plan (LDP) and sought further consultation.

Link in consultation with Barrhead, Arklet and Hanover Housing (Ref 669/1) - Settlement strategies should be grouped together like Falkirk's Local Plan.

Glasgow Jewish Representative Council (Ref 722/2) - Consultation with individuals or organisations representing the Jewish Community required.

(c) Proposals Map

James Baird, Coriolis Energy Ltd (Ref 99/3) - Use of different colours/symbols

Cala Homes and Taylor Wimpey (Ref 378/2) - Amend Proposals Map to show non-residential uses across the site.

Standard Letter Comment PMA (4 reps) (Ref 997/1)

Series of simple maps created to convey one element of a proposal at a time, thereafter proposals subject to a further/repeat consultation period.

Simpler maps created with reference to transport systems and geographical landmarks.

Standard Letter Comment PMB (13 reps) (Ref 998/1) - Simpler maps created with reference to transport systems and geographical landmarks.

(d) Regional Policy

Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/4) - Plan should contain additional details and information on the SDP.

(e) Habitats Directive

RSPB Scotland, South and West Region (Ref 280/1) - New section added after Section 1.8 to refer to the requirements of The Environmental Assessment (Scotland) Act 2005 and cross reference to the Environmental report to highlight this as a key requirement that has influenced the LDP.

(f) Supplementary Planning Guidance

James Sandeman (Ref 600/1), Iain McCowan (Ref 896/5) - All detail should be in the Plan not in SPG.

SEPA (Ref 70/56) - Produce SPG on buffer strips and restoration requirements.

Summary of responses (including reasons) by planning authority:**(a) General Comments****Objections****Ian Davidson (Ref 9/6), Standard Letter Comment 1.1A (2 reps) (Ref 984/1)**

The Proposed Plan sets out a long term land use strategy for the East Renfrewshire area supported by a range of policies and proposals. It seeks to establish the principle of development with further detail provided through Supplementary Planning Guidance including Development briefs and master plans.

Development Frameworks for the master plan areas have been prepared as documented under Issues 3.3- 3.5 (CD/21, CD/22 and CD/23) and agreed by East Renfrewshire Council at its meeting of 29th January 2014. These will in time form Supplementary Planning Guidance and consequently will be subject to further public consultation during Summer 2014.

There will also be consultation on detailed proposals through the development management process and in the case of major applications, applicants will require to submit a Proposal of Application Notice and undertake public consultation as part of this process.

Unresolved representations to the Plan will also be considered through this Examination process.

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

The Coal Authority (Ref 59/1), Confederation of UK Coal Producers (CoalPro) (Ref 472/1), Aardvark TMC Ltd (trading as ATH Resources) (Ref 503/1)

With regard to the development mining potential Scottish Planning Policy (SPP) (CD/69) states that there is a general presumption against extraction out with the area of search outlined within the Development Plan.

Together with the Glasgow and Clyde Valley Strategic Development Plan 2012 (SDP) (CD/81), the Proposed Plan will form the Development Plan for East Renfrewshire. Broad areas of search, for minerals have been identified within diagram 15 of the SDP; this includes both Surface Coal and Aggregate Minerals. The Broad areas of search for Surface Coal and aggregate minerals are focused outwith the East Renfrewshire area.

The legacy of the former mining activity within East Renfrewshire is addressed through criteria 13 within Policy D1: Detailed Guidance for All Development. This approach follows recommendations made by the Reporter at the previous Local Plan Examination.

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

SEPA (Ref 70/6)

SPP states that the Planning system has an important role in supporting the achievement of sustainable development through its influence on location, layout and design of new development and that an important part of the decision making in the planning system is taking into account the implication of development on water, air and soil quality.

The Council's Environmental Services monitors air quality and this has demonstrated no requirement to designate Air Quality Management Areas within East Renfrewshire. The requirements under Environmental Assessment (Scotland) Act 2005 will ensure that air quality amongst other environmental factors is thoroughly considered when assessing applications for planning permission. This is a factor which is integral to the SEA process and which has been carried out in tandem with the Proposed Plan. Strategic Policy 2: Assessment Of Development Proposals (Criteria 9) of the Proposed Plan contains reference to the impact on air, soil, including peat and water quality.

Given all these factors the Council considers that it has adequately covered the consideration of air quality as referred above and does not propose to create a specific policy or Supplementary Planning Guidance on air quality.

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

(b) Consultation and Layout Issues

Support

Norman Gray (Ref 214/4), Margaret Gray (Ref 231/6), John W Kilmurray (Ref 798/2) -

The Council acknowledges and welcomes the support for the consultation process.

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

Objections

Ian Davidson (Ref 9/1), Scottish Parliament (Ref 25/1), James Whyteside (Ref 82/1), Robert Johnston (Ref 131/6), Norman Graham (Ref 286/1), Dr Brian Robson (Ref 345/4), Margaret Hamilton (Ref 348/1), Ian Gladstone (Ref 380/1), John Muchan (Ref 492/2), Alistair Fyfe (Ref 541/1), Christine Woods (Ref 586/3), Ishbel C Woods (Ref 587/3), Aileen M Fyfe (Ref 599/1), Charlie McGeever (Ref 653/1), Link in consultation with Barrhead, Arklet and Hanover Housing (Ref669/1), Eugene Kelly (Ref 671/2), Jules McGeever (Ref 744/1), Glasgow Jewish Representative Council (Ref 722/2), Robert Caldwell (Ref 774/4), D Jesner (Ref 783/3), Evelyn Muchan (Ref 811/1), T D West (Ref 848/2), Iain McCowan (Ref 896/1) (Ref 896/12), Barrhead Community Council (Ref 924/8), Auchenback Tenants and Residents Association (Ref 938/8) Standard Letter Comment C01A (17 reps) (Ref 985/1)

The Local Development Plan process is set out in a range of Scottish legislation. The Plan has been prepared in accordance with this legislation. Para 1.4.3 of the Proposed Plan and Appendix A of the Monitoring Statement refers (CD/08). Circular 1/2009 - Development Planning (CD/72) set out the form and content of Local Development Plans and specifies in Para 55 that representations by stakeholders and the general public should be concise, no more than 2,000 words plus any limited supporting productions.

Each key stage of the process has been approved by the Council and subject to consultation which exceeds the statutory minimum.

The Council produced a Publicity Strategy (December 2012) (CD/12) to support the Proposed Plan. A draft of the strategy was discussed with representatives from the Planning Community Forum to inform its content. Its main purpose was to show the wide and varied public publicity and consultation that was to be undertaken when the Proposed Plan was published. It sought to make the Plan and process as accessible as possible.

The extent of consultation undertaken is set out in the Report of Conformity (CD/53) and has also be included in the 2014 Development Plan Scheme (DPS) (CD/52) which clearly shows that the Council has significantly exceeded the minimum statutory consultation requirements. The contacts section of the 2014 DPS will also be updated to take into account new interested groups such as the Glasgow Jewish Representative Council who previously have not submitted representations to the Plan.

Representations to the Proposed Plan (and as Modified) have been considered by the Council (CD/24) and those which remain unresolved will be examined at Examination. The outcome of this Examination will determine the final content of the Local Development Plan.

The Council does not propose to revert back to a previous stage in the Local Development Plan process.

The range of issues covered by the Proposed Plan requires the preparation of accompanying documentation and Supplementary Planning Guidance. The Council has aimed to ensure that the layout of the documentation is as user friendly as possible and has attempted to incorporate a range of presentational techniques to assist this. An explanation of accompanying documents is provided within Appendix1 of the Plan, and includes reference to the Monitoring Statement which reflects the most up to date evidence base on which to base the Plan.

Section 4 of the Proposed Plan sets out Keys Area for Change and Settlement strategies. The Council notes the comment that settlement policies and proposals should have been grouped together. The Plan aims to achieve this where possible, however it is considered that there is sufficient information in the Proposed Plan and accompanying Monitoring Statement in relation to the settlements. The Monitoring Statement (Appendix C) provides a Rural Settlement Analysis for each of the 4 settlements.

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

(c) Proposals Map

Objections

James Whyteside (Ref 82/18), Coriolis Energy Ltd (Ref 99/3), Robert Johnston (Ref 131/7), Caroline Viney (Ref 308/2), Dr Brian Robson (Ref 345/2), Margaret Hamilton (Ref 348/2), Ian Gladstone (Ref 380/6), Thornliebank Community Council (Ref 504/2), Charlie McGeever (Ref 653/3), Eugene Kelly (Ref 671/3), Norman Oliver (Ref 764/2), D Jesner (Ref 783/2), Barrhead Community Council (Ref 924/2), Auchenback Tenants and Residents Association (Ref 938/2), Standard Letter Comment PMA (4 reps) (Ref 997/1), Standard Letter Comment PMB (13 reps) (Ref 998/1)

It is acknowledged that the Proposals Maps show a range policies and proposals. The Council will review the Proposals Maps, the use of colours, contrasts, shading and the arrangement of symbols on the Key, in an attempt to make the maps clearer and easier to interpret.

The Council's on-line mapping tool should also help in achieving a more functional and user friendly map to users of the Council webpage.

In order to provide clarity and transparency for users of the Plan, if the Reporter was so minded to accept the representations, the Council would be supportive of the Proposals Maps being modified accordingly.

Cala Homes and Taylor Wimpey (Ref 378/2)

The concentrations of symbols on the Proposals Map at Maidenhill/Malletsheugh master plan area (Policy M2.1) are indicative to show the range of uses included within the master plan.

The Development Framework and resulting master plans will provide further detail and information in relation to development areas and uses.

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

(d) Regional Policy

Objections

James Whyteside (Ref 82/3), Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/4)

The principal role of the Glasgow and Clyde Valley Strategic Development Planning Authority is to prepare and maintain an up to date Strategic Development Plan for the area. This process involves engagement through joint working with the constituent 8 local authorities.

The SDP sets out a development strategy for the Glasgow and Clyde Valley to 2035 and provides a framework which all LDPs must conform to, including housing requirements.

The Proposed Plan should be as focused as possible and for this reason, references to the SDP and other overarching documents are limited. The most appropriate location for the SDP reference lies within the Monitoring Statement which provides the evidence base for the LDP. Each of the levels of the strategic policy framework are summarised under Para 1.5 to 1.6 of the Plan and Appendix A of the Monitoring Statement. The Plan and Monitoring Statement clearly demonstrate compliance with the SDP and how strategic issues are addressed.

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

(e) Habitats Directive

Objection

RSPB Scotland, South and West Region (Ref 280/1)

The Council acknowledges the comments made by RSPB Scotland which note that the Strategic Environmental Assessment (Environmental report) (CD/06) has been carried out under the Environmental Assessment (Scotland Act) 2005 and is a key requirement which has influenced the Proposed Plan.

If the Reporter is so minded the suggested additional text set out below by the respondent should be added after Para 1.8.4. The Council would be supportive of this modification because it would not have any implications for the Strategy or other policies within the LDP.

After Para 1.8.4 insert a new paragraph numbered 1.8.5:

1.8.5 “As part of the requirements under the Environmental Assessment Scotland Act (2005) the Council has undertaken a Strategic Environmental Assessment, which runs in tandem with the Local Development Plan process. This Strategic Environmental Assessment identifies and assesses significant environmental effects and has been a key influence on the Local Development Plan”.

(f) Supplementary Planning Guidance

Objections

SEPA (Ref 70/56)

The water environment has been specifically referred to within Policies E3: Water Environment and E5: Surface Water Drainage and Water Quality. Buffer strips as part of the multi-functional way of utilising the Water Environment, is referenced within the 'Green Infrastructure' section of the Proposed SPG: Green network and Environmental Management (CD/32) which was consulted on in tandem with the Proposed Local Development Plan. The Council considers it important that 'buffer strips' are not considered in isolation. The main aspects of this SPG have been utilised through preparation of Development Frameworks associated with the Masterplan areas under the guidance of Scottish Natural Heritage (SNH). The Council does not consider a separate Supplementary Planning Guidance on 'Buffer Strips' to be either necessary or proportionate. Issues can also be addressed at planning application stage.

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

James Sandeman (Ref 600/1), Iain McCowan (Ref 896/5)

Supplementary Planning Guidance has been produced in tandem with the Proposed Plan to ensure that the Plan remains as brief and focused as possible. In the event that Supplementary Planning Guidance were incorporated into the Plan this focus would be lost.

Planning legislation specifically gives Council's the opportunity to utilise Supplementary Planning Guidance to augment and further explain complex subjects. Para 93-99 of Circular 1/2009 provide the support for this approach.

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

Reporter's conclusions:

General

1. I consider that the proposed plan contains a sufficient level of detail to establish the principle and broad scale of development. Further details will be provided in Supplementary Guidance, development briefs and applications for planning permission, and there will be opportunities for further public consultation at the relevant stages. It would not be appropriate to go into a lot of detail in the proposed plan itself, since further work on development proposals requires to be carried out and there is a risk that excessive detail in the plan would unnecessarily constrain flexibility, make the examination unwieldy and lead to the plan soon becoming out of date.

2. In relation to minerals, paragraph 237 of Scottish Planning Policy states that local development plans should safeguard all workable mineral resources which are of economic or conservation value and ensure that these are not sterilised by other development, and requires plans to set out the factors that specific proposals will need to address. I acknowledge that the Glasgow and Clyde Valley Strategic Development Plan does not identify East Renfrewshire as a search area for new mineral resources, and that Strategic Policy 2 and Policy D1 of the proposed plan cover several of the criteria in Scottish Planning Policy paragraph 237. These policies appear, however, to have been drafted with built rather than extractive development in mind, and they do not explicitly address some of the factors listed in Scottish Planning Policy. While East Renfrewshire is not strategically important for mineral development, it still has some deposits and I consider that a specific policy is required to deal with any development affecting these. I have consulted the council on the terms of such a policy, and recommend the inclusion of a minerals policy on the basis now proposed by the council.

3. As regards air quality, I am satisfied that this has been adequately taken into account in preparing the proposed plan. There are several references to air quality in the Strategic Environmental Assessment. Strategic Policy 2, Criterion 9 requires proposals for new development to be assessed against their impact on air quality. Other policies in the plan will contribute to air quality improvement, notably Policy SG10: Sustainable Transport Network, which emphasises the promotion of walking and cycling and the reduction of the need to travel and reliance on the private car. I do not consider that a specific policy for air quality is necessary.

Consultation and layout issues

4. The council's participation statement outlines each stage of the preparation of the proposed plan and details how and when anyone can become involved. It is contained within the March 2012 Development Plan Scheme and the March 2013 and March 2014 Development Plan Schemes contain updated versions, including details on progress and timescales. I have noted the concerns expressed about the level, quality and complexity of the consultation process involved. However, I am aware that the methods employed by the council have either met, or in many cases exceeded, the minimum statutory consultation requirements. For example:

- A 16 week consultation period for the main issues report rather than the 6 week minimum
- A 12 week consultation period for the proposed local development plan rather than the 6 week minimum
- Drop-in sessions – 4 held at local libraries
- Forums involving developers, councillors, community councils, agents and the wider public
- Use of Planning Aid
- Publications – East Renfrewshire magazine and a Local Development Plan Newsletter
- Social media – use of council Facebook and Twitter accounts
- Posters and leaflets in council offices, libraries, other public buildings and local supermarkets
- Public exhibitions – display boards in libraries and digital TV screens in public buildings
- Neighbour notification – widened to 200 metres rather than the minimum 20 metres

5. The report of conformity submitted with the proposed plan sets out what the council did to conform with its participation statement. Following the receipt of further information, I notified the council on, 24 June 2014, to confirm that I agreed that it had complied with its participation statement and that the requirements of Section 19(4) of the Town and Country Planning (Scotland) Act 1997 (as amended) had been met. Therefore, while acknowledging that the process may sometimes appear overly complicated and bureaucratic, I find that the overall level of consultation undertaken by the council was appropriate. I have no remit to require council members or officers to attend consultation events or community meetings but welcome the council's commitment in paragraph 8.1 of its 2014 Development Plan Scheme to review the publicity and consultation in the light of experience. I also note the council's intention to include the Glasgow Jewish Representative Council in future consultations. I do not recommend any modifications to the proposed plan as a result.

6. As regards layout issues, I acknowledge the concerns expressed in representations that the proposed plan can be difficult to find ones way around. A degree of complexity is inevitable in a document that sets out the development strategy and policies for the whole council area. In general, the written statement follows a thematic structure and it may be necessary to refer to several different sections and schedules to find the policies and proposals that relate to a specific area. The Proposals Map provides the key to understanding how the plan affects each settlement and locality, though I recognise there are some concerns about its clarity which I address in the next section. Overall, I consider that the layout of the plan achieves an adequate standard and that modifications to improve its structure and presentation are not required.

Proposals Map

7. Regulations require a local development plan to contain a map or maps, to be known as "the Proposals Map", describing the policies and proposals set out in the plan, so far as practicable to illustrate such policies or proposals spatially. The Proposals Map is to be sufficiently detailed so as to enable the location of proposals for the development and use of land to be identified. I consider that the Proposals Map which forms part of the proposed plan meets the requirements of the regulations, but I have considerable sympathy with those representations which maintain that it is difficult to interpret. The overwhelming colour used is green, but to determine what the plan means for any particular location the reader has to decipher:

- (a) the shade of green that applies
- (b) the colour and direction of any cross-hatching
- (c) whether any part is enclosed by a solid line, and if so the colour of the line
- (d) letters and numbers referring to particular policies or proposals.

8. This can be hard work, and the council recognises that there is scope for making the maps clearer and easier to interpret. I note that the council would be supportive of the Proposals Map being modified in order to provide clarity and transparency for users of the plan. While I accept the general thrust of the representations, I do not consider it would be appropriate for me to prescribe specific modifications for this purpose. I therefore commend the council to review the presentation of the Proposals Map and to make any changes necessary to improve clarity by way of non-material modifications that do not change the meaning of the proposed plan.

9. On the specific matter of the Proposals Map indicating all non-residential uses to be

accommodated on the Maidenhill site, I agree with the council that the concentration of symbols is indicative to show the range of uses to be included within the master plan, and that the Development Framework and resulting master plans will provide further detail and information in relation to development areas and uses. There is therefore no need to modify the Proposals Map for this purpose.

Regional policy

10. I agree with the council that the brief summary in the proposed plan of the policy context provided by the strategic development plan is appropriate in terms of length and degree of detail. A fuller explanation is given in the Monitoring Statement. East Renfrewshire Council has participated in the strategic development plan preparation process, which provides the mechanism for defining the respective contributions of each council area towards the regional development strategy. The contributions required from East Renfrewshire are relatively modest, and are accurately reflected in the Monitoring Statement. It is for the local development plan to define how those contributions should be provided at the local level. I do not consider that there is any need for additional details and information regarding the strategic development plan to be included in the proposed plan.

Habitats Directive

11. I agree with the council that there would be merit in adding a reference to the Environmental Assessment (Scotland) Act 2005 as sought in the representation from RSPB Scotland. I have adopted the council's proposed modification for this purpose.

Supplementary Planning Guidance

12. While I recognise the potentially valuable role of buffer strips, these are just one feature of caring for the water environment and I do not consider that they merit separate Supplementary Guidance in their own right. I note that there is a reference to buffer strips in the council's proposed guidance on Green Network and Environmental Management.

13. Planning Circular 6/2013 sets out the Scottish Government's policy in relation to Supplementary Guidance (paragraphs 135-150). Scottish Ministers envisage that to allow plans themselves to focus on vision, the spatial strategy, overarching and other key policies and proposals, much detailed material can be contained in Supplementary Guidance. Such guidance must be limited to the provision of further information or detail in respect of policies or proposals set out in the local development plan. There must be a sufficient "hook" in the plan's policies or proposals on which to hang the Supplementary Guidance, in order to give it statutory weight. The guidance is subject to public consultation and to scrutiny by Scottish Ministers. I consider that the council's use of Supplementary Planning Guidance in relation to the proposed plan is appropriate, and that to bring these matters within the proposed plan itself would make the plan unnecessarily lengthy and dense.

Reporter's recommendations:

I recommend that the following modifications be made:

1. Amend the heading of paragraph 1.8 to read "Habitats Directive and Environmental Assessment"

2. After paragraph 1.8.4 insert a new paragraph numbered 1.8.5:

“1.8.5 As part of the requirements under the Environmental Assessment (Scotland) Act 2005 the Council has undertaken a Strategic Environmental Assessment, which runs in tandem with the Local Development Plan process. This Strategic Environmental Assessment identifies and assesses significant environmental effects and has been a key influence on the Local Development Plan”.

3. After paragraph 7.11.2, insert a new sub-heading: “ **7.12 Minerals**”

4. Add new paragraph 7.12.1 as follows:

“Scottish Planning Policy states that local development plans should safeguard all workable mineral resources which are of economic or conservation value and ensure that these are not sterilised by other development, and requires plans to set out the factors that specific proposals will need to address. The approved Glasgow and Clyde Valley Strategic Development Plan sets out a strategy on minerals, and defines broad search areas for new workable reserves. While no search areas were identified within East Renfrewshire, the Council will take into account the potential benefits of protecting known mineral deposits when considering development proposals that could affect such deposits. Where proposals for mineral extraction are put forward, the Council will apply the criteria listed in Policy E8 below.”

5. Add new policy E8: Minerals as follows:

“7.13 Policy E8: Minerals

7.13.1 Proposals 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 for the future.

7.13.2 Proposals for new and/or extended mineral extraction require to comply with Strategic Policy 2 and Policy D1 and will be assessed against Strategy Support Measure 9 of the Glasgow and Clyde Valley Strategic Development Plan and the accompanying Background Report 10: Minerals Search Areas, and against the following criteria:

- disturbance, disruption and noise, blasting and vibration, and potential pollution of land, air and water;
- impacts on local communities, individual houses, sensitive receptors and economic sectors important to the local economy;
- benefits to the local and national economy;
- cumulative impact with other mineral and landfill sites in the area;
- effects on natural heritage, habitats and the historic environment;
- landscape and visual impacts, including cumulative effects;
- transport impacts; and
- restoration and aftercare (including any benefits in terms of the remediation of existing areas of dereliction or instability). A financial bond or legal agreement may be required to ensure appropriate decommissioning and site restoration arrangements are secured.”

Issue 2.1.1	STRATEGIC VISION AND OBJECTIVES	
Development plan reference:	Chapter 2: Strategic Vision and Objectives	Reporter: Katrina Rice
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>James Whyteside (Ref 82/17) Mr and Mrs P Layden and Richard Layden (Ref 86/2) Scottish Natural Heritage (Ref 88/5) Richard A Shaw (Ref 234/3) T I A McCall (Ref 265/1) Education Department, East Renfrewshire Council (Ref 275/1) John Dickie (Ref 495/2) Robert Caldwell (Ref 774/1)</p>		
Provision of the development plan to which the issue relates:	2.3 Vision 2.4 Strategic Aim 2.5 Objectives Table 2 LDP Themes	
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p><u>Vision</u></p> <p><u>Mr and Mrs P Layden and Richard Layden (Ref 86/2)</u> - Support overall LDP and strategic vision and objectives, overall compliance with national and city region policy.</p> <p><u>Scottish Natural Heritage (Ref 88/5)</u> - Support and in particular by 2025 "enhanced green network."</p> <p><u>Strategic Aim</u></p> <p><u>Richard A Shaw (Ref 234/3)</u> - Strategic Aims and Objectives are supported.</p> <p><u>Objectives</u></p> <p><u>Education Department, East Renfrewshire Council (Ref 275/1)</u> Support the objectives and how they support the vision. Education have been consulted many times in development of the plan and this is recognised within key themes.</p> <p><u>Objections</u></p> <p><u>Vision</u></p> <p><u>James Whyteside (Ref 82/17)</u> - The Vision states ER to remain a desirable place to live and work but this is being eroded through the loss of Green Belt, leisure and amenities proposed in the plan. Quality of life will be degraded.</p>		

T I A McCall (Ref 265/1)

Amount of growth planned will make East Renfrewshire an undesirable place to live
 Growth planned and previous growth since 2008, do not have the necessary infrastructure - schools/medical/social in place
 Recent development has already been to the detriment of Newton Mearns
 There is no local employment in Newton Mearns
 Pressures on Newton Mearns and Eaglesham too great and Busby, Clarkston and Netherlee are already overflowing
 Roads already highly congested
 Why is tourism a factor and does this include day visitors
 Aims of the plan are unrealistic
 Plan does not satisfy the needs and wishes of residents

Objectives**John Dickie (Ref 495/2)**

5 key Objectives not being met.
 Plan does not promote principles of sustainable growth.
 Equality cannot be achieved with the reliance on cars.
 ERC has no track record of improving amenity by design.
 ERC poorly served by public transport and proposal will increase congestion.
 Independent body should report on sustainable development and reducing carbon.

Robert Caldwell (Ref 774/1)

lacks detail and without measure to determine successful outcomes
 What does "address the impact of climate change" mean in practice, how will it be achieved, same for other 5 objectives and 27 sub-themes
 Does not understand "address out-commuting of workforce"

Modifications sought by those submitting representations:

James Whyteside (Ref 82/17) T I A McCall (Ref 265/1) - These representations queried the vision due to the growth and development opportunities promoted through the Development Strategy.

Robert Caldwell (Ref 774/1) - This representation seeks clarity on the objectives, key themes and sub themes and how they can be monitored.

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

Vision: Mr and Mrs P Layden and Richard Layden (Ref 86/2), Ross Johnston, Scottish Natural Heritage (Ref 88/5)

Strategic Aim: Richard A Shaw (Ref 234/3)

Objectives: Education Department, East Renfrewshire Council (Ref 275/1) - The Council acknowledges and welcomes the support for the Vision, Strategic Aim and Objectives of the Plan.

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

Objections**Vision****James Whyteside (Ref 82/17), T I A McCall (Ref 265/1)**

Para 2.1 to 2.6 of the Proposed Plan set the context and describe the main attributes of the Council area. From this a clear vision, strategic aim and objectives are formed.

These are supported by 4 'Key Themes' as shown in Figure 3 and Table 2 of the Proposed Plan. The Vision, aims and objectives, themes and sub themes also set the context and underpin the strategy and policy framework for the area.

In setting a vision for the Authority the Council has recognised that one of the core principles of SPP (CD/69) as stated in Para 8 is that Plans should set out "ambitious, long term visions for their area".

The objections received to the Plan's vision are closely linked to comments received to the Plans strategy. These issues are addressed under Issue 2.1.2: Development Strategy where it is clearly demonstrated that the Development Strategy will provide sustainable development and growth for East Renfrewshire and provide social, environmental and economic benefits for its communities.

The Vision, Strategy and Objectives of the Proposed Plan are in accordance with SPP.

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

Objectives**John Dickie (Ref 495/2)**

The Council disagrees with this representation. The 5 strategic objectives are being or will be met through the policies and proposals set out in the Plan.

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

Robert Caldwell (Ref 774/1)

The Monitoring Statement (CD/08) and Strategic Environmental Assessment (SEA) (CD/06) provide the appropriate mechanisms for monitoring progress on the Plans policies and proposals focusing on what has changed and setting the direction for future reviews. Para 20 of SPP refers.

Under the theme of 'Economy' the Plan aims to address out commuting of the workforce. The Proposed Plan aims to support the local economy ensuring continued access to local work opportunities. Seeking higher skilled and higher value jobs close to where people live will also help to reduce out-commuting of the workforce and attract inward investment. New initiatives such as live/work units that encourage residents to work within their area are promoted. In turn this will help to reduce travel distances and reduce carbon emissions. This also links into the sub theme of addressing climate change which again is a theme that underpins the strategy and policies of the Plan. However the Council does acknowledge that the vast majority of residents travel out with the authority area and the need for good transport links to surrounding area is essential.

It is viewed that the wording of the sub themes are clear and additional wording is not required.

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

Reporter's conclusions:

1. Scottish Planning Policy and National Planning Framework 3 share a single vision for the planning system in Scotland. The strategic aim and 5 key objectives of the proposed plan reflect the 4 planning outcomes listed in Scottish Planning Policy which explain how planning should support this vision (paragraphs 14 to 23). Objectives 1 and 2 reflect outcome 1 – a successful, sustainable place; objective 3 reflects outcome 3 – a natural, resilient place; objective 4 reflects outcome 4 – a more connected place and objective 5 reflects outcome 2 – a low carbon place. These are then supported by the 4 themes of the proposed plan, environment, economy, social and delivery. The development strategy is based on delivering the strategic aim and objectives and building on the 4 themes.
2. The council proposes a two strand approach to development based on regeneration and consolidation of urban areas while allowing urban expansion to be master planned at 3 Strategic Development Opportunities at Newton Mearns and Barrhead. I acknowledge the concerns about the level of growth proposed and the locations of growth but I find under Issue 2.1.2 that the development strategy proposed is appropriate. It is in line with paragraph 48 of Scottish Planning Policy which 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. Despite the representations to the contrary, I consider that the development strategy supports the objectives of the proposed plan.
3. Policies M2.1, M2.2 and M3 on the Strategic Development Opportunity sites state that master plans will be prepared for each site in partnership with landowners, developers and key agencies. These will be adopted as supplementary guidance. The policies list some of the main infrastructure requirements which the master plans will be expected to address. In addition, the council's supplementary planning guidance on development contributions together with strategic policy 3 require that all new developments which individually or cumulatively generate a need for new infrastructure or services will be expected to deliver or contribute towards their provision. I am satisfied that the above policies, master plans and the council's action programme will ensure that the necessary infrastructure is secured in order to deliver the proposed plan's vision and objectives.
4. The council's monitoring statement aims to monitor changes in the physical, economic, social and environmental characteristics of the area and the impact of policies and proposals. It is intended to assess how successful the local development plan is in achieving its objectives and confirm whether policies and proposals continue to be effective or whether they should be reviewed. The council states that the monitoring statement will be updated periodically and will allow the council to adjust the nature and application of policies where appropriate and if necessary bring forward alternative approaches or guidance. The monitoring statement, together with the action programme (which sets out the main actions required to implement and monitor the proposed plan's key policies, proposals and strategy) will be the tools used to assess if the objectives and themes of the proposed plan (including addressing the impact of climate change) are being successfully achieved. I do not consider that amendments to the proposed plan are necessary.
5. Finally, I agree that the term "out-commuting" is overly technical and should be explained in simpler terms.

6. See also Issue 2.1.2 – Development Strategy.

Reporter's recommendations:

I recommend that the following modification be made:

1. Replace the fifth bullet of the economy theme in Table 2 with the following:

“Address the issue of residents travelling outside East Renfrewshire to work (out-commuting)”.

Issue 2.1.2	DEVELOPMENT STRATEGY	
Development plan reference:	Strategic Policy 1: Development Strategy	Reporter: Katrina Rice
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Miller Homes SW (Ref 77/2) (Ref 77/3) Mr and Mrs P Layden and Richard Layden (Ref 86/1) Scottish Natural Heritage (Ref 88/6) Bett Homes (Ref 138/2) Renfrewshire Council (Ref 194/1) Education Department, East Renfrewshire Council (Ref 275/2) RSPB Scotland, South and West Region (Ref 280/2) Wallace Land Investment and Management (Ref 331/6) Cala Homes and Taylor Wimpey (Ref 378/3) CALA Homes (West) and Paterson Partners (Ref 414/1) Glasgow City Council (Ref 465/1) Sport Scotland (Ref 702/3) Mactaggart and Mickel Homes Limited (Ref 703/3) Glasgow Jewish Representative Council (Ref 722/3) Persimmon Homes Ltd (Ref 743/6) Nazir Ahmed (Ref 755/12) Homes for Scotland (Ref 758/8) (Ref 758/11) Transport Scotland (Ref 962/1) Lynch Homes (Ref 965/8) Francis Baird and family (Ref 979/1) Elderslie Estates (Ref 983/1)</p> <p><u>Appendix 1: Common Objections List of Representees and Standard Letters(A)</u> Strategic Policy 1: Development Strategy - Common Objections List of Representees (57 reps) Standard Letter Comment SP1A (65 reps) (Ref 1014/1) Standard Letter Comment SP1B (9 reps) (Ref 1015/1) Standard Letter Comment SP1C (5 reps) (Ref 1016/1)</p>		
Provision of the development plan to which the issue relates:	Chapter 3: Development Strategy and Strategic Policies 3.1 – 3.11.2 Development Strategy Para 3.13 and Figure 4 – Key Diagram Policy D2: General Urban Areas – Para 5.3-5.4.1	
Planning authority’s summary of the representation(s):		
<p><u>(A) STRATEGIC POLICY 1: DEVELOPMENT STRATEGY</u></p> <p><u>Support</u></p> <p><u>Miller Homes SW (Ref 77/2) (Ref 77/3)</u> (Ref 77/2) Fully support the Council’s strategy and, in particular, the two strand approach to development which includes controlled growth, masterplanned and developed to the following locations: Barrhead South – Springhill, Springfield, Lyon Cross, Strategic</p>		

Development Opportunity and Urban Expansion.

(Ref 77/3) Miller Homes also support the key diagram Figure 4, which shows the location of the major release areas.

Mr and Mrs P Layden and Richard Layden (Ref 86/1)

Support Development Strategy and policies

Support growth including Barrhead South - Lyoncross SDO

Considers this to be a justified release of Green Belt and will provide a defensible boundary to unplanned growth.

Scottish Natural Heritage (Ref 88/6) - We welcome the development strategy and that there will be the “continued protection and enhancement of the greenbelt and countryside around towns and the green network”

Renfrewshire Council (Ref 194/1) - Renfrewshire Council recognise the LDP builds on many elements of the Adopted Local Plan. It is considered that elements of the strategy that propose changes will have minimal implications for Renfrewshire.

Education Department, East Renfrewshire Council (Ref 275/2)

Education welcomes the two strand approach to development as a means of consolidation and the controlled approach of master planning particularly in areas where schools are operating close to capacity. The approach is important to ensure growth is delivered in a phased way with schools, public transport, roads and green space provided as an integral part.

The plan is clear development will lead to increased demand for school places and new community facilities (para3.10).

Glasgow City Council (Ref 465/1) - Propose housing in excess of SDP, however, most sites are within urban areas or on the edge of settlements, but not adjacent to Glasgow, and therefore present no significant issue to Glasgow City Council.

Newton Mearns Community Council (Ref 686/2) - Support strand 1 of Para 3.1.2 – consolidation of urban areas.

Homes for Scotland (Ref 758/8) - Commends the Council for producing a clear, balanced and well-argued strategic approach which conforms to the requirements of Scottish Planning Policy. In particular, it is clear about the need to accommodate development while balancing a range of economic, social and environmental factors and, where necessary, making choices between competing pressures.

Elderslie Estates (Ref 983/1) - Support policy in terms of consolidation, controlled urban expansion, green belt and green network and areas of change. Specifically support some limited growth in Neilston

Summary of Common Objections

(Full list of representees set out in Appendix 1 and objections set out in Appendix 2 with summarised key points set out below)

- LDP provides for more homes than required by SDP.
- Urban Expansion against SDP - Schedule 11A figure of 5700 houses is not a requirement or direction of policy to allocate new sites and does not justify major Green Belt release – Brownfield first.

- No justification for enormous scale of strategic land release.
- ER has not followed SPP approach of housing land up to year 7 of SDP
- Levels of affordable housing in SDP does not translate into new house building requirements - other measures such as housing management conversion etc can be used. Schedule 10 SDP figure is not a requirement or guide for land allocations.
- Plan does not set out a settlement strategy with the first key point being efficient use of existing buildings, land and infrastructure.
- No reasoned justification as to why 'Areas of Change' chosen or setting out consideration of alternatives 'Defensible Boundaries' approach not considered sound planning principle if used on its own to justify land release.
- The homes currently approved through the existing Local Plan (8% growth) more than double required by the estimated population growth from the office of national statistics.
- No evidence of appetite for investment required
- Reduction in Green Belt.
- Huge areas of Brownfield in Glasgow that should be redeveloped first – depopulation of city.
- Brownfield sites and sites earmarked for business, together with sites such as Greenlaw where there is no demand should be used rather than Green Belt land.
- Barrhead, Neilston and Uplawmoor have had less development than Newton Mearns.
- Places such as Busby improving but need better strategy
- City centre living is more environmentally friendly than suburban.
- Fundamentally alter the appeal and amenity of East Renfrewshire.
- LDP does not deal with the increased infrastructure requirements for the number of homes proposed eg roads, education, public transport, GP services or general amenities – investment required.
- Commitment of other public bodies and service providers has not been demonstrated
- Traffic impact on M77.
- Public transport currently poor due to high levels of car ownership.
- Roads already getting full to capacity.
- Flood risk and drainage issues from overdevelopment
- Sequential approach not demonstrated in LDP as stated in SP2.
- Existing new developments not all sold - 3000 houses with permission yet to be built
- Clarity needed on phasing approach.
- Council not implementing housing needs by allowing 4/5 5/6 bedroom houses instead of the smaller units required
- Affordable housing ER has significant pressure with known differences between Eastwood and Levern Valley.
- Commutation is abhorrent, developers should not be allowed to exclude affordable from their site and will not deliver the needed affordable housing
- Maidenhill sites sit on watercourses and support natural habitats.
- Object to productive agricultural land being developed before less productive sites
- Enabling access to greenspace is contradicted by the proposal to release Green Belt for development.
- Plans for Aurs Road will discourage users of the park.
- SG2.7 and SG2.8 should be the first removed by reduction in numbers through this sequential approach.

- LDP25 and LDP23B have increased in size without justification, important sites that prevent coalescence
- As part of a sustainable development policy new housing and businesses should be directed to those lower altitude sites in preference to higher altitude sites in any ward.
- Council trying to increase revenue to fund over extravagant spending.
- Incinerator unacceptable.
- Every 5 year review a building/development programme should be set out and provide for objections.
- Document long winded and difficult to understand.
- Poor publicity of consultation
- Maps unclear

Other Objections

Bett Homes (Ref 138/2)

Housing strategy relies on master planning sites which require upfront investment
Smaller sites more viable in economic climate
Quantative but not qualitative assessment

RSPB Scotland, South and West Region (Ref 280/2) - Welcome support for sustainable development. However, reference to the natural environment is required to ensure the policy is consistent with this aim.

Cala Homes and Taylor Wimpey (Ref 378/3) - Welcome Council's growth strategy but not clear why a strategy of 'consolidation' and 'controlled urban expansion' has been chosen over 'flexible long term growth' as was favoured in the MIR. The MIR confirmed 'flexible long term growth' as 'most appropriate and sustainable strategy'. Support long term growth approach in order to meet SPP requirement for a generous supply of land for new housing

Sport Scotland (Ref 702/3)

Precautionary principle - sportscotland request a clear, unequivocal interpretation is provided in proposed plan
Request to be consulted on masterplans and development briefs

Mactaggart and Mickel Homes Limited (Ref 703/3)

Not sufficient to rely on 3 SDOs for delivery of plans housing target
Fails to take account of need for 'truly generous supply'
Does not take account of lead in time for masterplans
Suggests inclusion of further sites

Glasgow Jewish Representative Council (Ref 722/3)

One of the stated key objectives to the Local Development Plan is to 'Provide for local needs and equality of access to housing, jobs, facilities and services, particularly to assist in social inclusion.'

The Glasgow Jewish Representative Council has undertaken wide ranging consultation on the future needs of the Jewish community and infrastructure requirements. There are a number of issues specific to the demographics and religious and cultural needs of the Jewish community which require to be taken into consideration as part of ERC's Proposed Local Development Plan. There is a specific need to cater for the large Jewish population in East Renfrewshire in terms of housing - particularly for the ageing

population who require faith specific care. There are a number of younger people living within their family homes that would like to live independently within the same area to ensure that their continuing social, cultural and religious needs can be met in a faith specific environment. Future planning for these individuals should include the availability of suitable supported accommodation located within the heart of the Jewish community, and should also take into account the differing housing needs across the age range. There is also requirements for Jewish education, community and religious facilities within the plan.

Persimmon Homes Ltd (Ref 743/6)

Para 3.3.6, Pg 16

The very use of the word “longstanding” somewhat contradicts the later use of the phrase “generous and flexible” as it proves that many of the sites which are included within the pre-LDP established and effective land supply have been awaiting delivery for a significant period of time.

Transport Scotland (Ref 962/1) - New station referred to under policies M2.1 and SG10.4

(B) GREENFIELD SITES

Objections

Wallace Land Investment and Management (Ref 331/6)

Policy does not acknowledge the value of Greenfield land infill or adjacent to settlements has to offer in delivering sustainable economic growth. Policy could be reworded (below). Development on Green Network designated land does not automatically result in adverse impacts and can facilitate Green Network objectives.

CALA Homes (West) and Paterson Partners (Ref 414/1)

Para 3.12.2 does not acknowledge the value sustainable Greenfield land within or adjacent to existing settlements has to offer in developing sustainable economic growth - Policy could be reworded to maintain flexibility
Development on Green Network does not automatically result in adverse impacts.

Lynch Homes (Ref 965/8)

Does not acknowledge value of sustainable Greenfield land as infill is directly adjacent to settlements offer in sustainable economic growth as part of urban consolidation
Development on land designated as green network does not automatically result in adverse impacts on green network objectives.

(C) RURAL SETTLEMENTS

Objections

Homes for Scotland (Ref 758/11)

Paragraph 3.3.5. Homes for Scotland is not persuaded by the arguments for limiting growth in rural settlements to the degree proposed. The detailed reasons are dealt with in representations on Section 6 of the Plan.

Paragraph 3.3.6 Homes for Scotland does not agree that the Plan as presented contains a generous and flexible housing land supply. The detailed reasons for this, and proposed changes, are dealt with in representations on Section 6 of the Plan.

Francis Baird and family (Ref 979/1)

Consider it is not possible to meet all housing needs with Brownfield sites and Green Belt development is necessary, consider current Green Belt allocations in plan insufficient to meet housing needs.

Limiting development in rural settlements to infill is a missed opportunity for Waterfoot Housing supply is not generous as claimed.

(D) POLICY D2: GENERAL URBAN AREAS**Support**

Nazir Ahmed (Ref 755/12) - Support policy

Modifications sought by those submitting representations:**(A) STRATEGIC POLICY 1: DEVELOPMENT STRATEGY**

Ulric J Gerry (Ref 21/1), Iain Cameron (Ref 22/2), Scottish Parliament (Ref 25/2), James Whyteside (Ref 82/5, 82/6, 82/8), Andrew Beaumont (Ref 142/2), Patricia Beaumont (Ref 143/1), Janet Mylett (Ref 191/1), Iain Donaldson (Ref 252/1), Mrs I Cameron (Ref 272/2), James Scrimger (Ref 278/1), Janice Scrimger (Ref 284/1), Norman Graham (Ref 286/3), Tom Weir (Ref 334/1), Dr Brian Robson (Ref 345/1), Jane Donaldson (Ref 375/1), Ian Gladstone (Ref 380/2), Susie Stewart (Ref 408/4), Irene Graham (Ref 448/2), W R Barr (Ref 470/1), Anne M Macfarlane (Ref 491/1), John Muchan (Ref 492/1), A L S Mill (Ref 499/1), Eaglesham and Waterfoot Community Council (Ref 510/3), Lynda Murray (Ref 511/1), Derek Morris (Ref 528/1), Keith A Vallance (Ref 536/1), Simon Calvert (Ref 546/1), Ron Fairholm (Ref 572/7), Neil Warren (Ref 578/1), Alison Smith (Ref 585/5), Stuart Smith (Ref 591/5), James Sandeman (Ref 600/3), Martyn Gallop (Ref 619/1), Barbara Macdonald (Ref 632/1), Grace McCarthy (Ref 638/6), T Nigel Brown (Ref 664/1), Ruth Mavunga (Ref 673/2), Julie Mylett (Ref 704/1), Jennifer and Walter Speculand (Ref 710/1), Homes for Scotland (Ref 758/11), Iain Rennie (Ref 791/2), Karen Mitchell (Ref 799/2), Alistair Mooney (Ref 801/1), Sheila Mitchell (Ref 807/2), Margaret Hislop (Ref 812/1), Diane Kerr (Ref 841/2), Stuart S Pirie (Ref 845/1), John Corstorphine (Ref 884/1), Iain McCowan (Ref 896/2), John Boyle (Ref 958/1), Standard Letter Comment SP1A (65 reps) (Ref 1014/1), Standard Letter Comment SP1B (9 reps) (Ref 1015/1), Standard Letter Comment SP1C (5 reps) (Ref 1016/1)

Strategy should focus on delivery of Brownfield sites only - Huge areas of Brownfield in Glasgow that should be redeveloped first.

A hierarchy of land release must be developed to ensure developers cannot access Greenfield before committing to Brownfield.

Brownfield sites available for housing should be clearly displayed.

Plan should provide clarity on where development of 3200 houses will go.

Proposed Strategy will result in negative impacts upon infrastructure (roads, schools, drainage, and health), the environment, amenity and will not deliver social or economic benefits.

Housing numbers should be reduced further.

As part of a sustainable development policy new housing and businesses should be directed to those lower altitude sites in preference to higher altitude sites in any ward.

Joseph Fell (Ref 87/1)

Plan must demonstrate sequential approach.

Remove sites SG2.7 and SG2.8 from Schedule 11 and Proposals Map and redesignate as Green Belt.

Marion Fleming (Ref 98/2) - Plan should provide explanation about the depopulation of Glasgow.

Robert Johnston (Ref 131/8)

Strategy should seek to protect Green Belt land.

Policy should require on site delivery of affordable housing.

Policy must be clearer on meeting housing needs and delivering required house sizes.

Bett Homes (Ref 138/2) - Revised strategy required that promotes smaller more deliverable sites.

John Stewart (Ref 204/1) - Brownfield sites and sites earmarked for business, together with sites such as Greenlaw where there is no demand should be used rather than Green Belt land.

Busby Community Council (Ref 226/1)

Strategy should clearly plan for adequate infrastructure.

At every 5 year review a building/development programme should be set out and provide opportunity for comment.

RSPB Scotland, South and West Region (Ref 280/2)

Revised policy wording:

Proposals will be supported where they provide positive economic, environmental and social benefits to the area.

Cala Homes and Taylor Wimpey (Ref 378/3) - Flexible long term growth strategy should be promoted as set out in MIR

Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/2)

Policy and proposals should be deleted and replaced with an urban regeneration approach reflecting the role of East Renfrewshire in SDP area.

John O'Malley (Ref 477/3)

Plan must demonstrate sequential approach.

Remove sites SG2.7 and SG2.8 from Schedule 11 and Proposals Map and redesignate as Green Belt.

Add section on sequential approach process and publish audit of planning applications following policy implementation.

James Sandeman (Ref 600/2) (Ref 600/3) (Ref 600/5)

Plan should be clearer on how a defensible Green Belt boundary is provided.

Plan should be clearer on the application of the Phasing policy and approach.

Newton Mearns Community Council (Ref 686/2)

Delete M2.1, SG2.7 and SG2.8 and SG1.32.

Reallocate SG6.10 for housing.

Sport Scotland (Ref 702/3) - Clarity on Precautionary principle should be included in the plan.

Mactaggart and Mickel Homes Limited (Ref 703/3)

Plan should allocate additional sites to meet in full SDP requirements.
Change wording to all tenure for 5700 homes.

Glasgow Jewish Representative Council (Ref 722/3) - Housing and other education, community and religious facilities should be included within the plan.

Persimmon Homes Ltd (Ref 743/6)

Para 3.3.6, Pg 16 the word “longstanding” should be clarified.
In order to promote a “generous and flexible” supply post-LDP adoption further housing sites should be released which are capable of being developed within the plan period.

Transport Scotland (Ref 962/1) - Replace new railway station with ‘Proposed New Railway Station’.

(B) GREENFIELD SITES

Wallace Land Investment and Management (Ref 331/6), CALA Homes (West) and Paterson Partners (Ref 414/1), Lynch Homes (Ref 965/8)

Revised policy wording:

Regeneration and consolidation of urban areas with an emphasis on developing Brownfield and vacant sites in addition to sustainable Greenfield land where its development meets an identified need alongside the continued protection and enhancement of the green belt and countryside around towns and the green network.

(C) RURAL SETTLEMENTS

Homes for Scotland (Ref 758/11) - Plan should allocate Green Belt land in rural settlements for development.

Francis Baird and family (Ref 979/1)

Plan should allocate Green Belt land in rural settlements for development.

Add third point to policy:

Village Expansion: in order to ensure that the local communities needs are met for housing, economic and community facilities over the plan period, there will be appropriate development opportunities identified which will result in Green Belt boundary adjustment.

Summary of responses (including reasons) by planning authority:

(A) STRATEGIC POLICY 1: DEVELOPMENT STRATEGY

Support

Miller Homes SW (Ref 77/2) (Ref 77/3), Mr and Mrs P Layden and Richard Layden (Ref 86/1), Scottish Natural Heritage (Ref 88/6), Renfrewshire Council (Ref 194/1), Education Department, East Renfrewshire Council (Ref 275/2), Glasgow City Council (Ref 465/1), Newton Mearns Community Council (Ref 686/2), Homes for Scotland (Ref 758/8), Elderslie Estates (Ref 983/1)

The Council welcomes and notes the supporting comments in relation to the strategy of

the Plan. Support for the Plans environmental focus from SNH and comments from Homes for Scotland that the Plan provides a clear, balanced and well-argued strategic approach which conforms to the requirements of Scottish Planning Policy (SPP) (CD/69) are particularly welcomed.

Due to the volume and level of detail expressed in representations points have been addressed under sub sections a-k below.

Objections

Ulric J Gerry (Ref 21/1), Iain Cameron (Ref 22/2), Scottish Parliament (Ref 25/2), James Whyteside (Ref 82/5, 82/6, 82/8), Joseph Fell (Ref 87/1), Marion Fleming (Ref 98/2), Robert Johnston (Ref 131/8), Bett Homes (Ref 138/2), Andrew Beaumont (Ref 142/2), Patricia Beaumont (Ref 143/1), Janet Mylett (Ref 191/1), John Stewart (Ref 204/1), Busby Community Council (Ref 226/1), Iain Donaldson (Ref 252/1), Mrs I Cameron (Ref 272/2), James Scrimger (Ref 278/1), Janice Scrimger (Ref 284/1), Norman Graham (Ref 286/3), Tom Weir (Ref 334/1), Dr Brian Robson (Ref 345/1), Jane Donaldson (Ref 375/1), Cala Homes and Taylor Wimpey (Ref 378/3), Ian Gladstone (Ref 380/2), Susie Stewart (Ref 408/4), Irene Graham (Ref 448/2), Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/2) (463/6), W R Barr (Ref 470/1), John O'Malley (Ref 477/3), Anne M Macfarlane (Ref 491/1), John Muchan (Ref 492/1), A L S MILL (Ref 499/1), Eaglesham and Waterfoot Community Council (Ref 510/3), Lynda Murray (Ref 511/1), Derek Morris (Ref 528/1), Keith A Vallance (Ref 536/1), Simon Calvert (Ref 546/1), Ron Fairholm (Ref 572/7), Neil Warren (Ref 578/1), Alison Smith (Ref 585/5), Stuart Smith (Ref 591/5), James Sandeman (Ref 600/2, 600/5), James Sandeman (Ref 600/3), Martyn Gallop (Ref 619/1), Barbara Macdonald (Ref 632/1), Grace McCarthy (Ref 638/6), T Nigel Brown (Ref 664/1), Ruth Mavunga (Ref 673/2), Newton Mearns Community Council (Ref 686/2), Sport Scotland (Ref 702/3), Mactaggart and Mickel Homes Limited (Ref 703/3), Julie Mylett (Ref 704/1), Jennifer and Walter Speculand (Ref 710/1), Persimmon Homes Ltd (Ref 743/6), Homes for Scotland (Ref 758/11), Iain Rennie (Ref 791/2), Karen Mitchell (Ref 799/2), Alistair Mooney (Ref 801/1), Sheila Mitchell (Ref 807/2), Margaret Hislop (Ref 812/1), Diane Kerr (Ref 841/2), Stuart S Pirie (Ref 845/1), John Corstorphine (Ref 884/1), Iain McCowan (Ref 896/2), John Boyle (Ref 958/1), Standard Letter Comment SP1A (65 reps) (Ref 1014/1), Standard Letter Comment SP1B (9 reps) (Ref 1015/1), Standard Letter Comment SP1C (5 reps) (Ref 1016/1)

(a) Development Strategy

A number of objections were received regarding the Strategy of the Plan with concerns raised over the Plans compliance with the Approved Strategic Development Plan (SDP) May 2012 (CD/81), housing land supply, Green Belt boundaries and other associated infrastructure matters. These issues are addressed below. It is worth noting that neither the Scottish Government nor any of the Key Agencies raised any significant concerns with the Development Strategy and the approach taken in the Plan or the Strategic Environmental Assessment (SEA) (CD/06).

The strategy of the Proposed Plan to 2025 reflects the need to achieve a sustainable pattern of development. In accordance with Para 77 of Scottish Planning Policy (SPP) the Plan sets out a settlement strategy to provide a long term context for development, promote the efficient use of land and buildings, coordinate development with infrastructure requirements and ensure the protection of the Environment. This is based upon delivering the vision, strategic aim and objectives set out in section 2 of the Plan.

The Main Issues Report (MIR) (CD/03) set out a preferred option (Option 2b) and a series of alternatives as required by legislation. The Proposed Plan builds upon this document talking into account comments received and factors in new information and guidance. This process resulted in the deletion of a number of sites from the Preferred Option. Although the terminology has changed the aims and objectives of the preferred MIR option (Option 2b) and the agreed strategy for the Proposed Plan are similar and carry forward the 3 key master plan areas. The Proposed Plan has been prepared following extensive consultation with a range of stakeholders and prepared as a user friendly clear document.

The Proposed Plan supports a positive and pro-active approach to development and sets out how it seeks to address the economic, social and environmental issues faced by the Authority. In accordance with Para 5 and 8 of SPP the Plan sets out a forward-looking, visionary and ambitious strategy to guide development.

The strategic policy framework for the policies in the Plan is contained in national (SPP) and regional guidance in the SDP. Each of these levels of the strategic policy framework are summarised under Para 1.5 to 1.6 of the Plan and Appendix A of the Monitoring Statement (CD/08). The Plan and Monitoring Statement clearly demonstrate compliance with the SDP and how strategic issues are addressed.

The SDP provides the sustainable long term planning framework for the region through the provision of an integrated land use and transport strategy. One of the main aims is the recycling of brown field land. The SDP is prepared in partnership with each of the 8 Local Authorities in the region. The SDP is based upon an optimistic recovery of the wider region's economy and a quicker return to past growth rates. The main housing evidence base for the SDP and the LDP is the Strategic Housing Need and Demand Assessment (SHNDA) (CD/82). The SHNDA takes account of current housing need, demographic trends and projections and the current and anticipated supply of housing. The population and household projections and assumptions used are set out in the SHNDA are summarised in Appendix B Tables B6 and B11 and Appendix H1 Table H1.5 of the Monitoring Statement and Planning for the Future Document (CD/59).

It was stated that development could cause depopulation in Glasgow and the strategy would prevent regeneration of the city. These are strategic issues that are considered by the SDP.

Policies M2.1: Maidenhill/Malletsheugh, M2.2: Barrhead South and M3: Shanks/Glasgow Road are critical to the delivery of the Council's long term vision and development strategy for East Renfrewshire. To ensure the developments are carried out in a manner that delivers the Council's vision and delivers development in a sustainable way, the Plan makes it clear that the sites will be master planned.

These areas have been selected because they are considered to be the most sustainable areas for regeneration and/or urban expansion, are contained within well defined Green belt boundaries and will provide housing range and choice for both the Eastwood and Lovern Valley Housing Market Areas. Development frameworks have been prepared for these sites to control phasing and delivery of houses and the required infrastructure priorities including schools and improved transport connections. The Frameworks were agreed by Council at its meeting on 29th January 2014 (CD/21, CD/22 and CD/23). The master plans will be adopted by the Council as Supplementary Planning Guidance and will be consulted upon with a range of organisations, including Key Agencies, Community

Council and other technical organisations such as sports Scotland. Issues 3.3, 3.4 and 3.5 demonstrate in detail the effectiveness and deliverability of these sites and how other issues raised including design, layout, drainage, transport impacts, infrastructure provision and green networks have been/will be addressed.

It was stated that the LDP should be based upon a 5 year period (Ref 226/1). Para 21 of SPP states that the Plan should be reviewed at least every 5 years and should focus on what has to change rather than invite the re-opening of settled issues. The Council will continue to monitor and review the Plan as recommended by SPP.

(b) Housing Land Supply

LDPs must provide an effective land supply and meet the requirements of SPP (Para 72 and 75 refer) and their respective SDP.

The Housing Requirement for East Renfrewshire is set out in Schedule 11A of the SDP and is a combination of the private sector requirement (2500) and the affordable housing requirement including backlog need (3200). This figure is calculated from the SHNDA which informed the SDP. Strategy Support Measure 10 'Housing Development and Local Flexibility' of the SDP provides further context and support for the Proposed Plans strategy.

A detailed assessment of the SDP Housing Requirements and the current housing land supply was undertaken to identify a realistic and achievable housing land supply target for the Proposed Plan. The justification and explanation of how the housing supply target of 4100 units was calculated is set out in Appendix H1 of the Monitoring Statement (CD/08) and demonstrated further under Issue 9.1: Housing Supply. It was viewed that a lower target would not meet the requirements of SPP and SDP. Issue 9.1 also demonstrates the need for additional green belt release in the Plan.

The Council maintains that this Plan makes adequate provision for housing including affordable housing through the provision of a generous supply of land for housing (28% greater than the SDP private sector requirements) and no additional releases are required. The Plan provides a continuous effective 5 year land supply. To provide further flexibility and generosity to the supply land is safeguarded for longer term development post 2025. Strategic Policy 2 also provides the framework for considering proposals on sites not allocated in the Plan. No allowance has been made for windfall and small sites which may come forward in the Proposed Plan period which will add to the supply once gaining consent. This would effectively add further flexibility and generosity to the supply. Key housing tables (CD/55) have been updated to reflect the 2013 HLA (CD/54) and factoring in sites included in the Proposed Plan, which again supports the Council's position.

The phasing of sites is addressed fully under Issue 9.1. In summary the Council maintains that such an approach remains appropriate. Phasing conditions attached to planning applications will continue to be pursued where appropriate.

The representation from Persimmon Homes (Ref 743/6) indicated the Plan used contradictory language by the use of the phrase 'longstanding' sites and 'generous and flexible land supply'. The Council recognises that some sites have been in the land supply for a number of years. However, this includes large sites currently under construction such as at Greenlaw and other sites with a current planning consent. The programming of all sites is set out in the HLA and agreed with Homes for Scotland. The

Council does not agree that therefore this phrase means that the Plan does not provide a generous land supply. The Council does not support the suggested text.

Notwithstanding the above in order to provide clarity to the Plan if the Reporter was so minded the Council would be supportive of modifying Para 3.3.6 as follows (additional text in italics):

....together with the longstanding *established* housing sites within the land supply....

(c) Housing Mix and Type

In accordance with Para 80 of SPP the Council recognises the need to provide a range and choice of housing opportunities across the Council area for both the Eastwood and Lavern Valley Housing Market Areas and to ensure that the right mix of housing is provided to address the varying housing needs of the Council area as demonstrated by the LHS (CD/57). The provision of a mix of house types, sizes and tenure can be secured through Policies SG4: Housing Mix in New Developments and SG5: Affordable Housing. An important aspect of this is to provide affordable housing on new housing sites through Policy SG5. Specialist housing to meet the needs of older people and other groups is also a priority as addressed further under Issue 10. Policy SG4 provides the framework for considering housing mix through the planning application and master planning approach where there is a known local need. Tables 6-8 of (CD/55) demonstrate that the Plan is providing a range and choice of housing site options.

The Council has a strong record of delivering affordable homes through a variety of types and tenures including shared equity, low cost home ownership, social rented (eg Polnoon Street) and also be securing commuted payments in accordance with PAN 2/2010: Affordable Housing and Housing land Audits (CD/77).

The Council recognises and clearly states within the Proposed Plan and the Monitoring Statement that affordable housing requirements can also be met through non new build means (Ref 463/2), Appendix H1 Para 1.8.29-1.8.30 and Table H1.7 refers. Para 6.2.5 of the Plan and Appendix H1 Para 1.8.18-1.8.20 and Para 1.8.21-1.8.27 and Table H1.7 also refer to the important role 'developer led' affordable housing can have in addressing affordable housing needs and the implications of reduced government subsidy.

(d) Green Belt

The importance and role of the Green Belt is a key component of the SDP as documented in Strategic Support Measure 8. The SDP states that the LDPs should identify the inner and outer boundaries of the Green Belt as a priority.

An updated review of the Green Belt Boundary utilising the principles in SPP (Para 159, 161 and 163 refer) was undertaken to inform preparation of the Plan and to meet the housing requirements of the SDP. In reviewing the green belt boundaries, the Council also considered a timescale beyond the length of the plan, i.e. beyond 2025 to ensure a longer term approach was undertaken to direct development to preferred locations and to provide a defence to unplanned growth. This process has resulted in a boundary which is considered to be robust, defensible and fit for purpose and is documented in Appendix D1 of the Monitoring Statement.

This review process together with the Site Evaluation (CD/09), including the sequential approach, and SEA informed which areas/sites should be released to meet the SDP

requirements as part of the Development Strategy. The site selection process is set out in Para 1.6-1.6.6 of Appendix D of the Monitoring Statement and covered issues such as landscape and visual sensitivity, coalescence and long term integrity of the Green Belt.

In preparing the Plan a new criteria was also added to Strategic Policy 2: Assessment of Development Proposals, criteria 8 that requires proposals to provide a defensible green belt boundary. This criteria is a key requirement for all new proposals in the Green Belt to prevent urban sprawl and further loss of Green Belt.

The Development Frameworks place strong emphasis on measures to decrease the use of private cars, the encouragement of public transport networks and a strong green network incorporating cycle and pedestrian routes to positively tackle climate change issues. There has been active partnership working with SNH and GCV Green Network Partnership to ensure these principles are firmly embedded within the Frameworks.

Representations were received concerning flooding and drainage capacity. The requirement for assessment of flood risk is recognised and accepted. Assessments will be carried out to inform the master plans and Development briefs.

One of the functions of the green network is to provide access to green space and the Green Belt. The provision of the green network is also a core component of any master plan. Access and improvements to the Country Park and upgrading of Aurs Road are key priorities for the Malletsheugh/Maidenhill master plan. This is demonstrated further under Issue 3.3.

It is not recommended that the Green Belt boundary requires any further modification.

(e) Brownfield Sites

As stated above one of the main aims of the SDP and the LDP is the recycling of brown field land. Each of the 8 Councils within the GCV region contributes to the aims of the SDP and will focus on meeting its housing targets and developing Brownfield sites through their individual LDPs.

A number of representations stated that the Plan and Strategy do not prioritise delivery of Brown field sites and that Brownfield sites in Glasgow should also be prioritised over development in East Renfrewshire. The Council strongly disagrees with these statements.

Emphasis on Brownfield development is one of the main themes running throughout the Plan. One of the key sites identified in the Plan is for the redevelopment of the former Shanks site in Barrhead (Policy M3) a large Brownfield site. The merits of this site are addressed under Issue 3.5. The Plan clearly states in Para 3.1.6 that Brownfield sites are the most sustainable locations and as stated above an assessment of their contribution towards meeting housing targets was undertaken.

The Council has no control over the ownership of sites and therefore cannot force developers to build on Brownfield sites only. However, the Council is fully committed to work closely with owners to assist with bringing sites forward for development.

(f) Infrastructure

The Council recognises that the Development Strategy must be deliverable and capable of being implemented. A number of representations state a failure of the Council to deliver the required infrastructure and services to support previous developments, such

as the provision of schools, roads, public transport and other services. It is stated that new developments will compound this position. On this matter the Council would state that the Plan has been prepared in consultation with the relevant service providers such as Scottish Water, SEPA, Transport Scotland and other Council Departments such as Education and Roads. The requirements of these organisations were incorporated into the Plan such as the requirement for two new Primary Schools in Newton Mearns. No significant issues were raised by any of the infrastructure and service providers during consultation on the Plan.

The Action Programme (CD/07) also provides a further opportunity to co-ordinate the phasing of development and infrastructure provision through a coordinated approach. The SPG on Development Contributions (2012) (CD/25) and future masterplans or development briefs, will also be important in clarifying the development requirements for each site providing certainty to the development industry. These issues are expanded upon under Issue 2.3 Development Contributions and Issues 3.3 to 3.5 where issues concerning school capacity and transport assessments are explained further.

The Proposed Plan also seeks to provide new community/leisure and educational facilities to meet future needs and ensure new facilities are integrated and accessible to local communities (Policy D13 and Schedule 7 refer).

The Proposed Plan seeks to reduce the need to travel and provide public transport improvements and improved connectivity across East Renfrewshire. There are a number of priority schemes identified in the Proposed Plan which will help deliver a more sustainable transport system through the promotion of public transport enhancements in conjunction with new development. The Council has worked in partnership with Transport Scotland and SPT in preparing the Plan, Action Programme and the Development Frameworks to ensure public transport is a key component of each. Proposals for a new rail halt at Barrhead and additional bus services at Maidenhill are referenced within the individual Development Frameworks. It is clearly shown that the Plan and future master plans will improve the public transport network across the Council area.

(g) Amenity

Representations stated that new development would result in a loss of amenity. Chapter 5 of the Proposed Plan focuses upon Placemaking and Design and the Proposed Plan emphasises that new development should be designed to create high quality, distinctive places and incorporate greenspaces. The Council also intends to prepare additional SPG on Designing Streets. The Plan therefore provides the appropriate policy framework to address such matters through the Development Planning and Planning Application process.

(h) Economic Development

A number of representations stated there was no demand for businesses and new employment.

East Renfrewshire does not have any Strategic Economic Investment Locations (SEIL's) within the SDP; however the SDP acknowledges that there are existing developments and existing locations which will continue to play an important economic, social and environmental role at the local level.

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 in accordance with the SDP. The Plan provides a flexible approach to economic delivery supporting employment generating uses on such sites as advocated by SPP.

East Renfrewshire is also characterised by outward bound commuting, particularly to Glasgow and beyond. The Plan seeks to create wealth in the local economy by encouraging living, working and spending locally. The Plan aims to see a change in the work/living pattern and the creation of opportunities to facilitate this. In addition the Council recognises the importance of the investment and the contribution that house building makes to the economy through short and medium term job creation. The Development Strategy will assist in meeting the Scottish Governments central purpose of increasing Sustainable Economic Growth.

Comments (Ref204/1) (686/2) were received regarding allocating the remaining employment land at the Greenlaw Urban Expansion area for housing. The Council recognises that demand for this site has been limited; however, this site forms an important element of the effective marketable business land supply and should be retained for economic development. This is important to ensure that a range of effective employment opportunities are provided across the Council area. The economic importance of this site is addressed further under Issues 9.2.5 and 11: Economic Development.

(i) Key Diagram

Support

Miller Homes SW (Ref 77/3)

The Council acknowledges and welcomes the support for the Key Diagram.

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

Objection

Transport Scotland (Ref 962/1) - The Council agrees with this representation.

If the Reporter is so minded to recommend that the Representation from Scottish Government on behalf of Transport Scotland is accepted and the Plan modified, as set out below, the Council would be supportive of this modification because it would strengthen the policy and would not have any implications for the LDP Strategy or other policies within the LDP.

The Key Diagram should be modified as follows (additional text in italics):

Proposed New Railway Station

(j) Other

House Prices - Reduction in house prices is not a planning matter.

Policy SG2.7 Hillfield and Policy SG2.8 Barcapel - Representations received regarding the retention of these sites within the Green Belt are addressed under Issue 3.2.

LDP 25 and LDP 23B - Newton Mearns Community Council (Ref 686/2) stated that these sites have increased in size without justification. LDP 25 has increased in size to reflect further information submitted by the land owner. LDP23B has remained unchanged.

Incinerator - The Council would state that this is not a proposal included within the Plan and the Council has not shown any support for including such a proposal.

Glasgow Jewish Representative Council (Ref 722/3)

Representations concerning accommodation needs are addressed under affordable housing and housing mix response above. The representation does not state or provide any further information on what the education, community and religious requirements are, however, Policy D13 provides the context for permitting new facilities if required.

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

(k) Strategic Policy 1: Development Strategy

RSPB Scotland, South and West Region (Ref 280/2)

The Council agrees with the representation from RSPB that reference to the natural environment is required in Strategic Policy 1.

If the Reporter is so minded to recommend that the Representation from RSPB is accepted and the Plan modified, as set out below, the Council would be supportive of this modification because it would strengthen the policy and would not have any implications for the LDP Strategy or other policies within the LDP.

Para 3.11.1 the 1st sentence should read(additional text in italics):

The strategy will deliver sustainable economic growth, encourage brownfield redevelopment and regeneration, meet and address housing needs and deliver other significant *economic, environmental and social* benefits.

Strategic Policy 1 2nd sentence 3.12.1 should read:

Proposals will be supported where they provide positive economic, *environmental* and social benefits to the area and meet the needs of the community up to 2025 and beyond.

Sport Scotland (Ref 702/3)

The Plan does not specifically refer to the precautionary principle. The Council recognises that SPP refers to this approach. However, the inclusion of additional text within the Plan is not deemed necessary or appropriate as SPP provides suitable clarity on this issue.

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

(B) GREENFIELD SITES

Objections

Wallace Land Investment and Management (Ref 331/6), CALA Homes (West) and Paterson Partners (Ref 414/1), Lynch Homes (Ref 965/8)

Given the plan's focus on regeneration and consolidation alongside controlled urban expansion it is considered that the proposed wording to amend Strategic Policy 1 to

enable Greenfield land to be released could undermine the overall development plan strategy. This approach accords with Para. 38 of SPP in terms of the preferred locations for new development i.e. regeneration and the reuse of previously developed land.

Strategic Policy 2 provides the framework for the consideration of proposals on sites not allocated in the Plan i.e. windfall sites. Criteria 1 of Strategic Policy 2 outlines the sequential approach favouring urban locations and Brownfield sites followed by Greenfield locations. Strategic Policy 1 clearly states that there is an emphasis on developing both Brownfield and vacant sites. Although most vacant sites are Brownfield some could also be green field sites.

As demonstrated above the Plan provides a generous housing land supply to meet the requirements of SPP and the SDP and no additional land releases are required. The development of windfall sites can also make a contribution to meeting housing needs and delivering sustainable economic growth, however, they are not included within housing supply calculations. In effect they provide additional flexibility to the supply. Strategic Policy 1 and the Sequential Approach set out in Strategic Policy 2 are therefore considered sufficiently robust to allow for the consideration of emerging land use proposals in terms of their location, and therefore it is not deemed necessary to include additional text on Greenfield sites to Strategic Policy 1.

The establishment of a green network in East Renfrewshire is a fundamental component of successful placemaking and will help deliver better, more sustainable places. Green networks provide a wide range of benefits for the urban environment including opportunities for physical activity, biodiversity, walking, cycling and urban drainage. Policy D4 and its associated SPG set out the policy framework for protecting and enhancing this resource. This policy does not preclude development occurring in the Green Network provided appropriate mitigation measures can be established. The Policy provides sufficient clarity to assess any applications for development.

It is not proposed to modify the Plan or Strategic Policy 1 based upon the above.

(C) RURAL SETTLEMENTS

Objections

Francis Baird and family (Ref 979/1), Homes for Scotland (Ref 758/11)

As demonstrated above the Plan sets out a development strategy that will guide and direct growth to the most sustainable locations up to 2025 and beyond. There remains considerable pressure for development in the Green Belt surrounding both the urban and rural settlements. A number of sites have been promoted for development through the consultation to the MIR and the Proposed Plan. Proposals have been evaluated through the Site Evaluation and SEA at relevant stages to inform each Plan stage. A detailed green belt boundary review has also been undertaken, as discussed above and as set out in Appendix D1 of the Monitoring Statement. The land/sites selected for release from the Green Belt are those which are considered to be the most capable of accommodating development and delivering the aims of the Plan. The Plan provides a generous housing land supply and no additional land releases are required.

A detailed analysis of the 4 rural settlements of Uplawmoor, Neilston, Waterfoot and Eaglesham was undertaken (Appendix C of the Monitoring Statement refers) to inform the Plan. This is expand upon under Issue 3.9. The results of this exercise informed Policies

M7 and M8 of the Proposed Plan. A number of Green Belt releases were identified for the village of Neilston only (Policy M8) with development restricted to infill opportunities compatible with local character and use in the other 3 rural settlements of Eaglesham, Uplawmoor and Waterfoot (Policy M7).

The Colliers representation also seeks further site releases in Waterfoot. 4 sites were evaluated through the Site Evaluation, of which one site LDP16A (Glasgow Road East) has subsequently gained planning consent and is under construction for residential development. It is not proposed to release any additional sites in the village through this LDP.

It was viewed that the approach for the rural settlements is appropriate to deliver sustainable levels of growth, provide a range and choice of sites and opportunities and not undermine the overall Development Strategy. This approach to development in the rural settlements accords with the requirements of SPP. No modifications to Strategic Policy 1 or Policy M7 to refer to village expansion are supported. Further justification is provided under Issue 3.9. Strategic Policy 2 also provides the suitable framework for considering future proposals on sites not allocated in the Plan.

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

POLICY D2: GENERAL URBAN AREAS

Support

Nazir Ahmed - The Council acknowledges and welcomes the support for Policy D2.

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

Reporter's conclusions:

Development Strategy

1. Scottish Planning Policy clearly states that the planning system should identify a "generous" supply of land for each housing market area (paragraph 110). 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. They should provide for a minimum of 5 years effective land supply at all times (paragraph 119). I find with regard to the arguments both for and against the level of the council's proposed housing supply figure and its delivery, including phasing, under Issue 9.1.

2. In order to assess how best to meet the scale of housing required by the Glasgow and the Clyde Valley Strategic Development Plan, the council's Main Issues Report set out alternative spatial options including a preferred option 2B: Flexible Long Term Growth. A review of green belt boundaries was undertaken, involving landscape character assessment, and the Strategic Environmental Assessment, a site evaluation methodology (based on the principles of sustainable development) and a rural settlement analysis were used to assess alternative, site specific, land use proposals. This process involved extensive consultation, 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 Board and other council departments

such as education and the roads service.

3. The development strategy included in the proposed plan reflects the results of this process and is based upon an urban expansion growth approach comprising of two strands, regeneration and consolidation of urban areas and controlled urban expansion. Development would be concentrated in the larger settlements of Barrhead and Newton Mearns. The housing sites listed in schedules 8, 9, 10 and 11 show an almost even distribution of development between these 2 settlements. I find the systematic approach involved in the production of the development strategy for the proposed plan to have been both transparent and robust.

4. It is proposed that growth will predominantly be delivered in 3 Strategic Development Opportunities. This will involve urban expansion into the green belt at Newton Mearns (Policy M2.1- Malletsheugh/Maidenhill) and at Barrhead South (Policy M2.2 – Springhill, Springfield, Lyoncross) and a major regeneration proposal at Barrhead North (Policy M3- Glasgow Road/Shanks Park), which contains a significant area of derelict and contaminated land. The Strategic Development Opportunities are intended to deliver not only private sector housing, but also affordable and particular needs housing, employment opportunities, neighbourhood scale retail development, community/leisure/educational/religious facilities, transport network and public transport improvements across the council area, the upgrading of vacant land and enhancements to the Dams and Darnley Country Park. These areas will be the primary focus for growth up to 2025 and beyond, with development and delivery controlled through a master planning, phasing and infrastructure approach. (The effectiveness and delivery of these sites is dealt with under Issues 3.3, 3.4 and 3.5).

5. A number of medium sized green field sites are also promoted, partly to address the issue of depleted rates of delivery on existing housing sites early in the plan period. In the rural settlements, development will be limited to infill only, focussing on meeting local identified needs, although some further growth has been identified at Neilston (Policy M8). Finally, Strategic Policy 2 provides a means of assessing proposals on land which is not already allocated. This policy applies a sequential approach to new developments which gives priority to the use of brownfield sites within the urban area, then to greenfield land within the urban area and finally to land adjacent to the urban area. The council will also produce a framework for assessing unallocated proposals as a technical document to support the proposed plan. This will provide a framework against which to assess the suitability of individual proposals on non-allocated sites.

6. The urban expansion and consolidation approach adopted reflects the policy principles set out in paragraph 40 of Scottish Planning Policy. This states that spatial strategies in development plans should promote a sustainable pattern of development through using land within or adjoining settlements for a mix of uses. Scottish Planning Policy also recognises that in developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and where necessary review the boundaries of any green belt (paragraph 50). I accept that where possible, the council has sought to direct development to brownfield or vacant sites within the urban area, but that there is an insufficient supply of vacant/derelict land to meet the all-tenure housing requirements of the strategic development plan. As a consequence, there is a need for green belt release. (A 1.2 percent reduction in the total area of green belt is proposed).

7. I do not agree with the argument advanced that existing employment sites should be developed rather than green belt land. Safeguarding existing business and employment

locations will ensure sustainable economic growth by continuing access to local work opportunities, reducing out-commuting and providing opportunities for inward investment. While acknowledging the lack of demand in the current economic conditions, a good supply of sites for employment generating uses will be essential to respond to economic recovery in the longer term. (See also Issues 9.2.5 and 11).

8. I am satisfied that the piecemeal release of a number of smaller individual green belt sites would not be able to deliver the range and scale of benefits which can be gained by a co-ordinated master planned approach to the Strategic Development Opportunities. Larger parcels of land will also enable development to be environmentally led, retaining and enhancing landscape features, the green network and access to green space within the sites and ensuring that the revised green belt boundary is robust. Furthermore, by considering a period beyond 2025 for development within the larger master plan areas, this will ensure that the revised green belt boundaries will endure and provide a defence to future unplanned growth. Strategic Policy 2 requires the provision of a defensible green belt boundary in new developments (criterion 8). The detailed delivery and phasing of the Strategic Development Opportunities, including the provision of robust green belt boundaries will be determined through the preparation of master plans. I note that these will be the subject of further consultation with key agencies and community councils, as well as engagement with landowners and developers.

9. I acknowledge that a detailed infrastructure requirement schedule will be completed for each master planned area and development briefs will be prepared for smaller sites. Master plans and development briefs will be prepared as supplementary guidance and will include an assessment of flood risk to accord with Policies E4 – Flood risk and E5 - Surface water drainage and water quality. I consider that the requirements of Strategic Policy 3, the supplementary planning guidance on development contributions, the action programme and master planning will ensure that the requirement for new infrastructure such as schools, public transport, roads and greenspace are provided as an integral part of the development process. I note that none of the main service providers have made fundamental objections regarding the infrastructure requirements as insufficient or incapable of implementation. I am aware of the criticism of those who claim failure to provide adequate infrastructure and services to support previous developments. However, I have insufficient evidence to show that there is or would be a shortfall in funding. Overall, I am satisfied that development contributions are capable of achieving the necessary level of provision.

10. Strategic Policies 1 and 2 set out how growth will be delivered through a planned and phased approach. Reference to “sustainable greenfield land” in criterion 1 of Strategic Policy 1 could undermine the strategy of regeneration and consolidation of urban areas and redirect development away from the master planned locations. I have found under Issue 9.1 that adequate housing land has been provided in line with the requirements set out in the strategic development plan. There is no numerical justification to allocate further sites for private housing. If further greenfield sites do come forward they can be assessed against Strategic Policy 2 or Policy M7 in relation to rural settlements and if in the green network, against Policy D4. For the same reasons, I find that the inclusion of policy support for further green belt releases at rural settlements would be inappropriate. (See also Issue 3.9).

11. I am aware that the council has no control over the owners of individual sites whether brownfield or greenfield and cannot force developers to build on brownfield sites only, but appreciate the council’s commitment to working with land-owners/developers to bring

such sites forward for development. The council will be able to monitor the development of both brownfield and greenfield housing sites through the action programme and its annual Housing Land Audit. The phasing of greenfield sites should also help to ensure that the emphasis is not taken away from the development of brownfield land and regeneration.

12. Overall, taking into account all of the representations made, I find that the development strategy, through a master planned approach, provides a long term vision of how East Renfrewshire will develop and grow up to 2025 and beyond. It will support the creation of sustainable mixed communities to help to ensure the continued delivery of new housing in accordance with both paragraph 122 of Scottish Planning Policy and with the strategic development plan and enable the council to control the future development of the area rather than deal with sporadic development proposals. I conclude that the development strategy of the proposed plan is appropriate and I do not propose its modification.

Other comments

13. I agree that the replacement of “longstanding” with “established” in paragraph 3.3.6 would remove ambiguity.

14. Policy SG4 – Housing mix in new developments and Policy SG5 - Affordable housing will ensure that new housing is delivered across all tenures and includes a variety of house types to meet the needs of a range of households in the area including older people, those with a disability, young people with special needs and ethnic minorities. (See also Issue 10). I acknowledge the accommodation needs expressed by the Glasgow Jewish Representative Council including the education, community and religious requirements. While having regard to the public sector equality duty under Section 149 of the Equality Act 2010, in the absence of any specific detail with regard to new sites, I am satisfied that any facilities/accommodation required could be adequately assessed using the existing policies in the proposed plan. I also note that all of the master plan areas include requirements for a range of house types and tenures, including affordable, and community/leisure facilities (including a potential site for a religious facility in 2 of the master plan areas).

15. With regard to amenity, the policies in chapter 5 of the proposed plan already emphasise the importance of creating high quality, distinctive places which incorporate greenspaces and the scope for new development to improve the character and quality of place. I do not consider that the proposed plan requires further modification.

16. I accept that the key diagram should be amended to read “proposed new railway station” in order to provide greater clarity on the current position of the proposal and to avoid any possible confusion that it is a committed project.

17. A proposal for an incinerator site is not included in the proposed plan. No modification is therefore required.

18. I agree that reference to the natural environment within the policy wording of Strategic Policy 1 and its supporting text is necessary to ensure that the policy is consistent with the aim of supporting sustainable development.

19. Paragraph 204 of Scottish Planning Policy refers to the application of the precautionary principle where the impacts of a proposed development on nationally or internationally significant landscape or natural heritage resources are uncertain. I do not consider it appropriate or necessary to repeat this approach in the proposed plan.
20. The layout of documents/maps and consultation issues are dealt with under Issue 1.
21. The green network is dealt with under Issue 4.1.
22. Sites SG2.7 Hillfield and SG2.8 Barcapel are dealt with under Issue 3.2.
23. Site LDP25 is dealt with under Issue 9.2.5.
24. Site SG1.32 Broom Park Drive/Windsor Avenue is dealt with under Issue 9.1.4.
25. Site SG6.10 Greenlaw is dealt with under Issue 11.
26. The suggested impact on property values is not a land use planning consideration.

Reporter's recommendations:

I recommend that the following modifications be made:

1. Replace "longstanding" with "established" in the first sentence of paragraph 3.3.6.
2. Include "environmental benefits" in the first sentence of paragraph 3.11.1.
3. Insert "environmental" after "economic" in the second sentence of strategic policy 1.
4. In Figure 4: Key diagram, replace "new railway station" with "proposed railway station".

Issue 2.2	STRATEGIC POLICY 2 ASSESSMENT OF DEVELOPMENT PROPOSALS	
Development plan reference:	Strategic Policy 2: Assessment of Development Proposals	Reporter: Katrina Rice
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Roger Quin (Ref 72/6) (Ref 72/7) James Whyteside (Ref 82/9) Scottish Natural Heritage (Ref 88/7) Jennifer Quin (Ref 129/18) Robert Johnston (Ref 131/4) Robert Russell (Ref 215/7) RSPB Scotland, South and West Region (Ref 280/3) Peter D Christie (Ref 329/4) Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/1) John O'Malley (Ref 477/4) John Hall (Ref 486/7) James Sandeman (Ref 600/6) Newton Mearns Community Council (Ref 686/1) Persimmon Homes Ltd (Ref 743/3)Ref 743/7) Homes for Scotland (Ref 758/9) D Jesner (Ref 783/1)</p> <p><u>Appendix 1 - Standard Letter</u> Standard Letter Comment SEA (18 reps) (Ref 999/1) Standard Letter Comment SEB (9 reps) (Ref 1000/1) Standard Letter Comment SP2A (62 reps) (Ref 1017/1) Standard Letter Comment SP2B (9reps) (Ref 1018/1)</p>		
Provision of the development plan to which the issue relates:	Chapter 3: Development Strategy and Strategic Policies Para. 3.14 – 3.15.1 Technical Documents: Site Evaluation Assessment Framework for Assessing Unallocated Proposals, Technical Document	
Planning authority's summary of the representation(s):		
<p><u>(a) Strategic Policy 2: Assessment of Development Proposals and Site Evaluation</u></p> <p><u>Support</u></p> <p><u>Scottish Natural Heritage (Ref 88/7)</u> We welcome the criteria which new development will be assessed against and particularly support the inclusion of the following criteria 4.The impact on the landscape character as informed by the Glasgow and Clyde Valley and the East Renfrewshire Landscape Character Assessments, the character and amenity of communities, individual properties and existing land uses; 8. The impact on the built and natural environment, including the green belt and green network taking into account the need for an Environmental Impact Assessment and the</p>		

requirement for proposals to provide a defensible green belt boundary and links to the green network;

9. The impact on air, soil, including peat and water quality;

10. The potential for remedial or compensatory environmental measures including temporary greening.

Objections

Roger Quin (Ref 72/7)

No demonstration that sequential approach methodology - urban, Brownfield, Greenfield, Green Belt has been used

Brownfield appears only 8 times in LDP, sequential 4

There is substantial availability of Brownfield land in ER, availability of information on

Brownfield land availability is poor however, Housing Land Audit impenetrable

Reference is made for the need to demonstrate non-Green Belt sites exist before Green Belt sites are used but no information is given on what steps are required

James Whyteside (Ref 82/9) - Release of Green Belt undermines the prioritisation of Brownfield.

Robert Johnston (Ref 131/4) - No record of implementation of 'sequential approach' or that developers have followed this

Robert Russell (Ref 215/7) - No demonstration that sequential approach methodology - urban, Brownfield, Greenfield, Green Belt has been used

RSPB Scotland, South and West Region (Ref 280/3) - Support this policy but suggest changes with reference to flood risk.

Peter D. Christie (Ref 329/4)

No demonstration that sequential approach methodology - urban, Brownfield, Greenfield, Green Belt has been used

No evidence potential developers have to consider Brownfield sites

Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/1)

Scoring does not reflect 'key primacy' of sequential test (Brownfield first, urban area, sites well served by public transport)

Outcome is not guided by overall land release targets with reasoned justification

John Hall (Ref 486/7) - No demonstration that sequential approach methodology - urban, Brownfield, Greenfield, Green Belt has been used

James Sandeman (Ref 600/6)

Key tests must be more rigorously applied

Brownfield sites should be retained and a very strong case made if not used

Newton Mearns Community Council (Ref 686/1)

Scoring shows distortion and bias on site selection

Scoring criteria do not match that of LDP policies

Persimmon Homes Ltd (Ref 743/3)

In terms of the sequential approach to development; it is not clear how this can be applied

to applications for development when an applicant is unlikely to have control over multiple sites. Each application should be considered on its own merits out with the requirement to compare the site to other sites which are not in the ownership of the applicant.

It is not clear how planning consents and conditions can stipulate matters such as size, type and tenure. This should be the concern of the house builder attached to the site, as they are more likely to understand the target market of the development.

Homes for Scotland (Ref 758/9)

Homes for Scotland objects to clauses 1 and 2 of this policy.

Clause 1 it is not clear how a sequential approach can be applied to planning applications. A sequential approach principally applies to the plan-making process, in terms of evaluating alternative site proposals for residential and retail uses in the main. This is accepted as a legitimate policy aim in plan formulation. However, at the level of an individual planning application, there is nothing in national policy and guidance applying such a test to a residential application. There is no guarantee that an applicant will have control over any other sites; if he does he may well intend to bring those forward too, but the timing and sequence of sites coming forward is driven by many factors including marketability, viability and constraints to be overcome.

Clause 2 is impractical. There is nothing in planning policy or guidance which allows a planning authority to control by conditions the sizes, types and tenures of housing. Even affordable housing policy can be delivered through a variety of types and tenures. The Glasgow and Clyde Valley HNDAs do not assess need by size, type and tenure of housing in any detail, other than by identifying need in terms of “affordable”, “market” and “intermediate”. The delivery of affordable and intermediate products will largely derive from negotiation on contributions through the Affordable Housing Policy SG5. Likewise the Local Housing Strategy does not contain detailed analysis of housing stock by size and type or assess future patterns of need at that level of detail.

D Jesner (Ref 783/1) - Scoring inconsistent and unexplained alterations made since MIR

Standard Letter Comment SEA (18 reps) (Ref 999/1)

Site Evaluation is illogical, inconsistent and does not define the meaning of the terms used. Unidentified concepts, is ambiguous, inconsistent and not rigorous.

Site evaluation using the Questions and the Matrix as proposed in the Site Evaluation December 2012 is not logical and not consistent; there is overlap in the questions used. The questions and sub-questions should be defined and a value attributed. The whole process of site evaluation will need to be re-run using the appropriate questions, appropriately defined and evaluated and new tables for 5 site evaluation matrix created. Little evidence sequential approach is put to practice

Adopted local Plan site evaluation comprised one site visit and desktop based subsequent assessments questions have varied over the last two Site Evaluations
None of the terms (11) used in the Site Evaluation are defined

'The choice of some of the terms in the matrix reduces the discriminatory power of the evaluation process because the same value for the term is allocated'

Q1 should be split into two tables Brownfield and Greenfield so that developers can be direct to Brownfield first

Q4 and Q5 confuse Accessibility with Access (as in MIR) a better word would be Proximity as distances are used for scoring

Q6 and Q7 should say sites 'will not be considered' not 'will not be considered favourably'

2.9.4 Transport Impact would be better as Traffic Impact and site traffic considered in the context of current spare capacity on adjacent roads
 misplaced reference to 'will not be considered favourably' inappropriate if no suitable access
 reference to public transport already covered in Q4
 Q9 Affordable Housing has 'no discriminatory power as an index'
 Q10 loss of facility an unlikely scenario
 Q11 'no discriminatory function'
 Barcapel spelt wrong (Barcapel)
 In the table LDP76 and LDP78 are duplicated.

Standard Letter Comment SEB (9 reps) (Ref 1000/1)

Unidentified concepts, is ambiguous, inconsistent and not rigorous.
 Adopt Site Evaluation based on defined concepts and re-evaluate sites
 Consult on sites selected through re-evaluation

Standard Letter Comment SP2A (62 reps) (Ref 1017/1) - No demonstration that sequential approach methodology - urban, Brownfield, Greenfield, Green Belt has been used.

Standard Letter Comment SP2B (9 reps) (Ref 1018/1)

No demonstration that sequential approach methodology - urban, Brownfield, Greenfield, Green Belt has been used
 No demonstration that this methodology has been used

(b) Framework for Assessing Unallocated Proposals

Objection

Roger Quin (Ref 72/6)

Document suffers from same problems as the Site Evaluation
 No details given on sequential approach
 'Landscape Character' and 'Cumulative Impact' comprise different attributes and should be under separate headings
 'Accessibility to Public Transport' should be changed to 'Proximity to Public Transport' and similarly for 'Services/Facilities'
 'Effectiveness' should be expanded and given separate headings with concepts defined
 'Transport Impact' should be 'Traffic Impact'
 Realistic assessment of expected school children must be undertaken, Education Department substantially underestimates

Jennifer Quin (Ref 129/18)

Document suffers from same problems as the Site Evaluation
 No details given on sequential approach
 'Landscape Character' and 'Cumulative Impact' comprise different attributes and should be under separate headings
 'Accessibility to Public Transport' should be changed to 'Proximity to Public Transport' and similarly for 'Services/Facilities'
 'Effectiveness' should be expanded and given separate headings with concepts defined
 'Transport Impact' should be 'Traffic Impact'
 Realistic assessment of expected school children must be undertaken, Education Department substantially underestimates

John O'Malley (Ref 477/4)

Sequential approach no details on how developer is to prove it has been followed
 Landscape Character and Cumulative Impact need defined
 Accessibility changed to Proximity to Public Transport
 Accessibility changed to Proximity to Services/Facilities
 Effectiveness explained
 Transport should be Traffic Impact

Persimmon Homes Ltd (Ref 743/7)

The Framework for Assessing Unallocated Proposals is considered a 'Technical Document' as part of the LDP but is not being consulted on. The previous Framework for Assessing Unallocated Housing Proposals was considered an SPG and was consulted on yet this document is not.

It was not made clear whether this document would be a material consideration as part of a planning application or whether it was simply 'guidance'. East Renfrewshire Council should seek to clarify the role of this document.

Modifications sought by those submitting representations:**(a) Strategic Policy 2: Assessment of Development Proposals****Sequential Approach**

Roger Quin (Ref 72/7), Robert Johnston (Ref 131/4), Robert Russell (Ref 215/7), Peter D Christie (Ref 329/4), Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/1), John Hall (Ref 486/7), Standard Letter Comment SP2B (9 reps) (Ref 1018/1)

Develop a policy for the implementation of a sequential option appraisal based on Brownfield first.

Adopted LDP should contain detail on the sequential approach principal and the policy to implement it, cross referenced from information other LDP documents.

An audit should be undertaken to show its effectiveness.

Housing Types, Sizes and Tenure

Persimmon Homes Ltd (Ref 743/3), Homes for Scotland (Ref 758/9)

Clause 1 should be deleted.

Clause 2 should be amended to read "the proposed mix of house types and tenures, with a view to encouraging mixed and balanced local communities."

Flood Risk

RSPB Scotland, South and West Region (Ref 280/3) - Suggest reference is made to flood risk as well as water quality in line with the requirements of SPP.

Site Evaluation

Newton Mearns Community Council (Ref 686/1), D Jesner (Ref 783/1) - Scoring and methodology should be revised.

Standard Letter Comment SEA (18 reps) (Ref 999/1)

Site evaluation should be displayed to separate Brownfield and Greenfield in separate tables.

Some of the questions would immediately exclude a site from consideration and these sites would not appear in the table. These would be Natural Heritage, Built Heritage and sites with no suitable access.

Impact of development would separate into Impact of Development on Landscape Character and Impact of development on Traffic. (Traffic and Transport should be defined and distinguished).

Accessibility to public transport would be changed to Proximity to Public Transport and Accessibility to Services /Facilities would be changed to Proximity to Services/Facilities to remove confusion with access to a site.

Double consideration of availability of transport facilities should be resolved – Public Transport should be removed from Q5.

The Questions for the table should exclude Affordable Housing, Other Community Benefits and Economic Benefits which have no discriminatory value.

Q8 Effectiveness should be defined and the question expanded into a number of separate sub-questions. Note a usage of effective – ‘effective’ sites are those which are expected to have completions in the next seven years – in an email from a Principal Planner.

The suggested questions would be: -

Q1 Site location

Q2 Impact of development on Landscape Character

Q3 Impact of development on existing and planned infrastructure

Q4 Impact of development on School Capacity

Q5 Impact of development on Traffic

Q6 Proximity to Public Transport

Q7 Proximity to Services/Facilities

Q8 Effectiveness

Standard Letter Comment SEB (9 reps) (Ref 1000/1) - Consult on re-evaluated site assessment.

(b) Framework for Assessing Unallocated Proposals

Persimmon Homes Ltd (Ref 743/7) - Clarify the role of this document.

John O'Malley (Ref 477/4), Roger Quin (Ref 72/6), Jennifer Quin (Ref 129/18)

No details given on sequential approach.

'Landscape Character' and 'Cumulative Impact' comprise different attributes and should be under separate headings.

'Accessibility to Public Transport' should be changed to 'Proximity to Public Transport' and similarly for 'Services/Facilities'.

'Effectiveness' should be expanded and given separate headings with concepts defined.

'Transport Impact' should be 'Traffic Impact'.

Realistic assessment of expected school children must be undertaken, Education Department substantially underestimates.

Summary of responses (including reasons) by planning authority:**(a) Strategic Policy 2: Assessment of Development Proposals and Site Evaluation****Support**

Ross Johnston SNH (88/7) - The Council notes and welcomes the support for this policy.

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

Objections

Roger Quin (72/7), James Whyteside (82/9), Robert Johnston (131/4), Robert Russell (215/7), Pter D Christie (329/4), Save the East Renfrewshire Green Belt Newton Mearns (463/1), John Hall (486/7), James Sandeman (600/6), Newton Mearns Community Council (686/1), Persimmon Homes Ltd (743/3), Homes for Scotland (758/9), D Jesner (783/1), Standard Letter SEA (999/1), Standard Letter SEB (1000/1), Standard Letter SP2A (1017/1), Standard Letter SP2 B (1018/1)

Strategic Policy 2: Assessment of Development Proposals provides the framework for full consideration of all development proposals including those not specifically provided for within the Plan. It prioritises the suitability of locations for new development starting with the most sustainable and only entertaining the least sustainable where it can be proven that realistic alternatives do not exist. Other policies in the plan expand and add detail to a number of these requirements.

The approach set out in relation to the Sequential Approach is considered to be acceptable. The Council recognises that SPP (CD/69) only applies a sequential approach in relation to retailing, however, Para. 38 sets out criteria which should influence the location of new development with an emphasis on regeneration and re-use of previously developed land. In addition, Para's 77 and 80 regarding housing locations also emphasise the priority for previously developed land within existing settlements before considering development on Greenfield sites. The approach in the Plan is therefore consistent with the emphasis of SPP.

A number of comments stated that in identifying sites for inclusion in the Plan the Council had not demonstrated that the sequential approach had been followed. In addition the methodology used in the Site Evaluation (CD/09) was queried.

On these points the Council would state that the site evaluation study was prepared to assist with the identification of sites to be included in the Plan. The methodology elaborates on the criteria set out in Strategic Policy 2 and remains appropriate.

The assessment methodology along with the Strategic Environmental Assessment (SEA) (CD/06), together provide a consistent, robust and objective framework for the assessment of land use proposals. The assessments produce scores which allow for the ranking of sites and are particularly useful for comparing the relative merits of proposals against one another. The site evaluation methodology was revised to address accessibility issues raised by SPT (CD/10). This has been applied consistently across all sites with the scoring changed accordingly. The Council stands by the outcomes of this exercise.

As stated in Para 2.1.6 of the Site Evaluation a significant element of the assessment process is the sequential approach. The Policy and the Sequential Approach are therefore considered sufficiently robust to allow for the consideration of land use proposals in terms of their location.

Under Issues 2.1.2 and 9.1 the Council has appropriately demonstrated that Brownfield sites alone are not capable of providing a sufficient and generous housing land supply and therefore a number of green belt sites have been identified for development. The site evaluation, SEA and Green belt review, Appendix D1 of the Monitoring Statement (CD/08), have been key to the identification of these sites.

In response to points raised that information on Brownfield sites and the Housing Land Audit (HLA) (CD/54) is poor the Council would state that the Monitoring Statement and the HLA provide a detailed and clear analysis of all information.

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

Housing types, sizes and tenure

Persimmon Homes Ltd (743/3), Homes for Scotland (758/9)

Criteria 2 relating to the provision of a mix of house types, sizes and tenure was included to recognise the need to provide a range of housing opportunities in the area. This criteria remains an important consideration. Para 80 of SPP refers to the 'need for Plans to provide housing choice across the housing market area. This issue is further addressed under Issue 10.

The Council does not wish to be overly prescriptive regarding house types, sizes and tenure. However, it is viewed important to provide a policy context within the Proposed Plan and to link this with the relevant housing documents including the LHS (CD/57) and various needs assessments. Strategic Policy 2 and Policies SG4 and SG5 provide the appropriate policy framework.

Flood Risk

RSPB Scotland South and West Region (280/3)

Policy E4 addresses issues regarding flood risk. However, the Council sees merit in including reference to this issue in this policy.

If the Reporter is so minded to recommend that the representation from RSPB is accepted, the Council would be supportive of this amendment as it would provide clarity and strengthen the policy and would not have any implications for other policies within the LDP.

Strategic Policy 2 criteria 9 should read (additional text in italics):

....after water quality...and avoiding areas where development could be at significant risk of flooding and/or could increase flood risk elsewhere.

(b) Framework for Assessing Unallocated Proposals**Objections****John O'Malley (Ref 477/4), Roger Quin (Ref 72/6), Jennifer Quin (Ref 129/18)**

Similar comments on the methodology used in the Framework for Assessing Unallocated Proposals (CD/14) document were raised with the Site Evaluation and are addressed in the above response.

This technical document provides a consistent and transparent framework for the assessment of proposals not allocated within the Plan. It is based on the criteria outlined within Strategic Policy 2 in the Proposed Plan.

This Technical Document is a tool for use by both the Council and applicants when assessing proposals. Applicants and the public can see the factors which will be considered in assessing a planning application.

The Council retains the view that the methodology and criteria remain relevant and allow a full and transparent assessment process.

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

Persimmon Homes Ltd (Ref 743/7)

As explained under Section 1.1.2 of the Framework for Assessing Unallocated Proposals document this document is not Supplementary Planning Guidance under section 22 of the Planning (Scotland) Acts as amended. It is a technical guidance tool only. All planning applications will be assessed against the Development Plan i.e. the Glasgow and Clyde Valley SDP and the Councils LDP and associated SPG.

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

Reporter's conclusions:**Strategic Policy 2 - Assessment of development proposals and site evaluation**

1. One of the policy principles of Scottish Planning Policy is that planning should direct development to the right place. It states that decisions should be guided by using land within or adjacent to settlements for a mix of uses and consider the re-use or re-development of brownfield land before new development takes place on green field sites (paragraph 40). I consider that criterion 1 of Strategic Policy 2 reflects this policy principle and clearly refers to the application of a sequential approach which gives priority to the use of brownfield sites. This criterion will help to support the creation of more compact, higher density, accessible and more vibrant cores in line with government policy. I regard its inclusion in the policy as appropriate and do not consider that further detail is required.

2. I accept under Issue 2.1.2 that there is an insufficient supply of vacant/derelict land to meet the all tenure housing requirement of the Glasgow and the Clyde Valley Strategic Development Plan and that as a consequence there is a need for green belt release. The implementation of this policy together with all of the policies in the plan will be monitored through the council's monitoring statement. This should include an assessment of the levels of brownfield/greenfield development. Further changes to the proposed plan are unnecessary.

3. Another policy principle in Scottish Planning Policy is that planning should support development that is designed to a high quality and demonstrates the 6 qualities of successful place. One of these 6 qualities is “adaptable”. This is development that can accommodate future changes of use because there is a mix of building densities, tenures and typologies (paragraph 44). Paragraph 110 states that the planning system should enable the provision of a “range” of attractive, well designed, energy efficient, good quality housing. Paragraph 128 states that where the housing need and demand assessment and local housing strategy process identify a shortage of affordable housing, the plan should set out the role that planning will take in addressing this. Paragraph 132 addresses the provision of specialist housing provision and other specific needs. Where a need is identified, planning authorities should prepare policies to support the delivery of appropriate housing.

4. The Glasgow and the Clyde Valley Housing Need and Demand Assessment states that the affordable housing requirements identified for East Renfrewshire reinforce it as an area of on-going significant pressure for affordable housing and projects a shortfall of affordable housing over the plan period. The key messages for the city-region are that a major focus will be on the housing and support needs of increasing numbers of older people households; there is a shortfall across the area in the number of houses currently designed or adapted for wheelchair use; and there is a requirement for more good quality affordable housing of suitable size for larger minority ethnic households. The council’s Local Housing Strategy aims to ensure that new housing is delivered across all tenures and includes properties suitably designed and of a type to meet the needs of a range of households, including older people, those with a disability, young people with complex needs and ethnic minorities. I am satisfied that criterion 2 of Strategic Policy 2 is both appropriate and necessary to meet the needs identified in the housing need and demand assessment and local housing strategy. Together with Policies SG4 – Housing mix in new developments and SG5 – Affordable housing this will help to deliver mixed and inclusive communities.

5. While noting the representations to the contrary, I am satisfied that the council’s site evaluation methodology is thorough and robust and provides a fair and consistent method of ranking and comparing alternative sites.

6. Finally, I agree that the absence of any reference to “flood risk” in a policy intended to cover proposals for new development would be unacceptable. The inclusion of a reference in criterion 9 is necessary to provide adequate guidance and to strengthen the policy.

Framework for assessing unallocated proposals

7. As stated in paragraph 3.14.2 of the proposed plan this framework will be a technical document to support the proposed plan. I understand that it will not be adopted as supplementary guidance by the council and will not therefore have any statutory status. I consider that the intentions of the council are clear and no amendments are required to the proposed plan.

8. I have no remit to comment on the representations with regard to the detailed content of this technical document.

9. See also Issue 9.1 – Housing supply, delivery and distribution.

Reporter's recommendations:

I recommend that the following modification be made:

1. Add the following to criterion 9 of Strategic Policy 2:

“ and avoiding areas where development could be at significant risk from flooding and/or could increase flood risk elsewhere.”

Issue 2.3	DEVELOPMENT CONTRIBUTIONS	
Development plan reference:	Strategic Policy 3: Development Contributions	Reporter: Katrina Rice
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mr and Mrs P Layden and Richard Layden (Ref 86/4) Education Department, East Renfrewshire Council (Ref 275/3) RSPB Scotland, South and West Region (Ref 280/4) Wallace Land Investment and Management (Ref 331/3) CALA Homes (West) and Paterson Partners (Ref 414/6) Claire Wharton (Ref 419/6) Keith A Vallance (Ref 536/2) Homes for Scotland (Ref 758/10) Lynch Homes (Ref 965/9)</p> <p><u>Appendix 1 - Standard Letter</u> Standard Letter Comment SP3A (17 reps) (Ref 1019/1)</p>		
Provision of the development plan to which the issue relates:	Chapter 3: Development Strategy and Strategic Policies Para. 3.16 – 3.17.5 – Infrastructure and Development Contributions	
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p><u>Mr and Mrs P Layden and Richard Layden (Ref 86/4)</u> - Support, subject to accordance with Circular 3/2012</p> <p><u>Education Department, East Renfrewshire Council (Ref 275/3)</u> Important in enabling improvements to school estate for those establishments operating near capacity. Policy takes account of cumulative effect of new housing development. The cost of new school provision is not inconsiderable, and the full funding implications require to be assessed against the extent of the anticipated level of the total developer contributions. If the developer contributions do not meet the full cost of the new schools then supplementary funding would be required. The proposed plan acknowledges this.</p> <p><u>RSPB Scotland, South and West Region (Ref 280/4)</u> Welcome support for contributions towards environmental works - suggest clarification of what is meant by environmental benefits. For example, where mitigation is not possible on site, contributions would be required for environmental works offsite to ensure no net loss of biodiversity.</p> <p><u>Objections</u></p> <p><u>Wallace Land Investment and Management (Ref 331/3)</u> It is recommended that this policy makes explicit reference to Policy Tests in Circular</p>		

3/2012 to ensure clarity

It is welcomed that the policy acknowledges the need to consider viability when determining the package of developer contributions

This Policy also needs to acknowledge that the provision of affordable housing requires to meet its proportionate share of developer contributions

Viability will require to be assessed against the provision of homes/land or financial contribution to delivering affordable housing alongside contributions to supporting services and facilities

CALA Homes (West) and Paterson Partners (Ref 414/6)

Policy should make explicit reference to policy tests in Circular 3/2012

Welcomed that the policy considered viability

Policy needs to acknowledge that the provision of affordable housing requires to meet its proportionate share of developer contributions

Viability needs assessed against homes/land/financial contribution when delivering affordable housing alongside contributions to supporting services and facilities

Claire Wharton (Ref 419/6) - Developer Contributions should be ring fenced for use in settlement directly affected by development.

Keith A Vallance (Ref 536/2)

LDP must include clear proposal on developer contributions (as opposed to saying SPG will be updated)

M2.1 requires substantial education contributions, costs within document inadequate and require doubled

Homes for Scotland (Ref 758/10)

Circular 3/2012 has replaced Circular 1/2010 and the text of the Plan should be updated accordingly.

Circular 3/2012 provides that applicants for planning consent can reasonably be expected to pay for either new services/infrastructure essential to make their developments acceptable in planning terms or for enhancements to existing services and infrastructure if the impact of development causes a deficiency in those services/infrastructure. The reference to "new infrastructure or services" in paragraph 3.17.2 is not sufficiently clear as to whether it covers both these circumstances.

Lynch Homes (Ref 965/9)

Policy should make explicit reference to policy tests in Circular 3/2012

This Policy also needs to acknowledge that the provision of affordable housing requires to meet its proportionate share of developer contributions

It is welcomed that the Policy acknowledges the need to consider viability when determining the package of developer contributions. This is in accord with Circular 3/2012 (para. 23).

Viability will require to be assessed against the provision of homes / land or financial contribution to delivering affordable housing alongside contributions to supporting services and facilities where appropriate

Standard Letter Comment SP3A (17 reps) (Ref 1019/1)

Development contributions be realistically set to achieve infrastructure and school capacity for existing residents before new housing development commence.

Calculation of children in new housing developments must be realistic (current calculation underestimates by 300%).

Modifications sought by those submitting representations:

Mr and Mrs P Layden and Richard Layden (Ref 86/4) - Refer to Circular 3/2012.

RSPB Scotland, South and West Region (Ref 280/4) - Clarification of what is meant by environmental benefits required.

Wallace Land Investment and Management (Ref 331/3), CALA Homes (West) and Paterson Partners (Ref 414/6), Lynch Homes (Ref 965/9)

Explicit reference to Policy Tests in Circular 3/2012 required.

Policy needs to acknowledge that the provision of affordable housing requires to meet its proportionate share of developer contributions.

Para. 3.17.2: New developments that individually or cumulatively generate a requirement for new infrastructure or services will be expected to deliver, or contribute towards the provision of, supporting services and facilities. Developer Contributions will be agreed in accord with the five Policy Tests in Circular 3/2012. Planning permission will only be granted for new development where the identified level and range of supporting infrastructure or services to meet the needs of the new development is already available or will be available in accordance with an agreed timescale.

Claire Wharton (Ref 419/6) - Developer Contributions should be ring fenced for use in settlement directly affected by development.

Keith A Vallance (Ref 536/2) - Suggest contributions calculation is altered to reduce the complexity and reinforce the sequential approach of Brownfield first - on Brownfield sites £7500 per house and on Greenfield £25000 per house.

Homes for Scotland (Ref 758/10) - It is suggested that in paragraph 3.17.2 line 2 there should be inserted after "new" the words "or enhanced".

Standard Letter Comment SP3A (17 reps) (Ref 1019/1)

Development contributions be realistically set to achieve infrastructure and school capacity for existing residents before new housing development commence.

Calculation of children in new housing developments must be realistic (current calculation underestimates by 300%).

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

Mr & Mrs P Layden and Richard Layden (Ref 86/4); Education Department, East Renfrewshire Council (Ref 275/3); RSPB Scotland, South and West Region (Ref 280/4)

The support for the Council's approach to development contributions is welcomed.

The support for the approach of the policy towards environmental works is also welcomed. The request for clarification in relation to environmental benefits is noted, however it is not considered appropriate to add this level of detail to the Policy, as this same level of detail would need to be added for each of the various infrastructure requirements, services and facilities, which would substantially lengthen the policy. It is considered that the appropriate location for such detail is the supporting supplementary planning guidance (CD/25). The Council is prepared to provide more clarity on this point

within its update to the SPG on development contributions.

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

Objections

Wallace Land Investment and Management (Ref 331/3); CALA Homes (West) and Paterson Partners (Ref 414/6); Lynch Homes (Ref 965/9); Homes for Scotland (Ref 758/10)

The Council agrees that specific reference to Circular 3/2012 Planning Obligations and Good Neighbour Agreements (CD/74) in Strategic Policy 3: Development Contributions would provide more clarity. The Council also sees merit in referencing the option of enhancing existing services and infrastructure where appropriate.

If the Reporter is so minded to recommend that the representations are accepted, the Council would be supportive of this amendment to Para 3.17.2 as it would provide clarity to the Policy.

In paragraph 3.17.2 change text to read (additional text in italics):

New developments that individually or cumulatively generate a requirement for new or enhanced infrastructure or services will be expected to deliver, or contribute towards the provision of, supporting services and facilities. Developer contributions will be agreed in accord with the five tests of Circular 3/2012. Planning permission will only be granted for new development where the identified level and range of supporting infrastructure or services to meet the needs of the new development is already available or will be available in accordance with an agreed timescale.

The Council considers that the development contributions policy should not apply to subsidised affordable housing (which is in receipt of grant from the Scottish Government). However developments containing subsidised affordable housing will be expected to comply with all development management policies. The policy will apply to affordable housing without subsidy (subject to viability). This detail will be provided in the update of the supported supplementary planning guidance, which once adopted will form part of the Plan.

Viability assessments will take into account the requirement for affordable housing. The detail around these assessments is contained in the Council's Adopted Development Contributions SPG (CD/25) (and will also form part of the updated document). The development contributions policy is not intended to inhibit development, but to alleviate issues that may prevent a development going ahead.

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

Claire Wharton (Ref 419/6), Keith A Vallance (Ref 536/2); Standard Letter Comment SP3A (17 reps) (Ref 1019/1)

The Council considers that Strategic Policy 3 sets out clear framework for development contributions. This is currently supported by detailed adopted supplementary planning guidance. The Council intends to update this guidance, which once adopted will form part of the Plan.

The preparation of Development frameworks for the master plan areas has established

the development potential of the sites including infrastructure requirements and development viability. Education provision for site M2.1 is discussed in detail under Issue 3.3. The Development Framework (CD/21) demonstrates delivery of two new Primary Schools. The contributions for Education are based upon the Councils Adopted SPG which was developed in consultation with the Council's Education Service.

As per Circular 3/2012, planning obligations should relate to the proposed development either as a direct consequence of the development or arising from the cumulative impact of the development in the area and should fairly and reasonably relate in scale and kind to the proposed development. Contributions are therefore calculated on a case by case basis depending on the specific mitigation requirements of the particular development. It is therefore not considered appropriate to impose standard 'roof tax' per property across the Council area. Contributions are not only based on education; mitigation may also be required for community facilities, greenspace and access, and roads etc. which can only be determined on a case by case basis.

Legal agreements set out exact contributions required in each case, including when they should be paid, and what they are to be used for (and the area where they are to be spent). Contributions are closely monitored within an appropriate accounting structure to ensure they are utilised for the particular use outlined in each agreement.

East Renfrewshire's pupil product ratio was determined by an audit of schools carried out by the Council's Education Service. Work has also been carried out to check this ratio against housing developments and actual pupil generation.

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

Reporter's conclusions:

1. I am satisfied that Strategic Policy 3 on development contributions sets out a realistic and achievable framework to meet identified needs without threatening the viability of sites. Paragraph 3.16.3 of the proposed plan recognises that it will not be possible to deliver all essential infrastructure through development contributions and that other funding sources, including from public sources may be required. I accept that explicit reference to Circular 3/2012 – Planning Obligations and good neighbour agreements in the policy wording and the addition of "or enhanced" to describe the infrastructure or services generated would further clarify the application of the policy.

2. Strategic Policy 3 currently applies to all new developments including the provision of affordable housing. All proposals will be assessed in accordance with this policy and the council's Supplementary Planning Guidance on Development Contributions (2012), to ascertain whether it is necessary for a development contribution to be made. Paragraph 4.16 of the supplementary planning guidance states that the contribution required from a grant funded project, such as the development of a site with 100 percent affordable housing by a registered social landlord, will be assessed in terms of the local advantages provided. I do not consider that specific reference to proposals for affordable housing in the policy wording is necessary.

3. The council's supplementary planning guidance clearly states that the purpose of development contributions is not to inhibit development but to alleviate issues that may prevent a development going ahead. The onus is on the developer to provide evidence demonstrating the negative impact that a contribution would have on the viability of a

development. Such viability assessments could take into account the provision of homes/land or financial contributions to delivering affordable housing. No modification to the proposed plan is required.

4. I agree that further clarification of what is meant by “environmental benefits” should be provided but consider that the level of detail suggested would be more appropriately explained in the council’s updated supplementary guidance rather than in the policy wording. No modification to the proposed plan is required.

5. The methods by which the costs of contributions are calculated and the exact levels of contributions are set out in the supplementary planning guidance, as recommended in Circular 3/2012. I note that this has been developed in consultation with council service providers including the education service and that none of the main service providers have made fundamental objections to the level of provision proposed. I have insufficient evidence to satisfactorily demonstrate that the levels of contributions required are unrealistic or inappropriate. In any event, the council proposes to monitor development contributions on a regular basis and to update its supplementary planning guidance. This will allow the council to adjust the level of contribution requirements to reflect changing developmental pressures, costs or the demands placed on services.

6. I am aware that it may be necessary to provide a wide range of facilities and infrastructure in order to mitigate the impacts of new developments. This could cover a range of subjects including local employment, community facilities, education, roads and transportation, public realm and green space. I do not consider that the imposition of a standard charge/flat rate per property is necessary and I am satisfied that the council’s intention to assess the need for development contributions for each development proposal individually and on its own merits is appropriate.

7. I note that legal agreements will set out the exact contributions required in each case including the area where they are to be spent. Detail with regard to the methods of collection and spending of funds should be included in supplementary guidance rather than the proposed plan itself. Paragraph 4.40 of the council’s supplementary planning guidance states that any contribution required will be held by the council in a separate earmarked reserve and disbursed to the relevant service providers according to the terms of the planning obligation. I do not consider that any additional modification to the proposed plan is required.

8. See also Issue 3.3 – Master plan – Malletsheugh/Maidenhill, Newton Mearns.

Reporter’s recommendations:

I recommend that the following modifications be made:

1. Add “or enhanced” after “new” in the first sentence of paragraph 3.17.2.
2. Add the following new second sentence to paragraph 3.17.2:

“Developer contributions will be agreed in accordance with the five tests of Circular 3/2012 – Planning obligations and good neighbour agreements”.

Issue 3.1	Master Plans	
Development plan reference:	Policy M1: Master Plans	Reporter: Dilwyn Thomas
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mr and Mrs P Layden and Richard Layden (Ref 86/5) Cruden Estates (Ref 248/1) Scottish Water (Ref 256/1) James Sandeman (Ref 600/7) Mactaggart and Mickel Homes Limited (Ref 703/2)</p> <p><u>Appendix 1 – Standard Letter</u> Standard Letter Comment M1A (18 reps) (Ref 993/1) Standard Letter Comment M1B (7 reps) (Ref 994/1)</p>		
Provision of the development plan to which the issue relates:	Chapter 4: Key Areas for Change and Settlement Strategies Para. 4.1 – 4.2.2 – Delivery	
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p><u>Mr and Mrs P Layden and Richard Layden (Ref 86/5)</u> - Endorse as the correct approach for master planning of SDOs.</p> <p><u>Cruden Estates (Ref 248/1)</u> - Support policy as enables development of Shanks site.</p> <p><u>Scottish Water (Ref 256/1)</u> - Support and will work closely with Local Authority and participate in the master plan process.</p> <p><u>Objections</u></p> <p><u>James Sandeman (Ref 600/7)</u> - Detailed infrastructure requirement schedules for the master plan areas should be displayed in the LDP.</p> <p><u>Mactaggart and Mickel Homes Limited (Ref 703/2)</u> - 4.2.2. insert 'ideally' between "should" and "relate".</p> <p><u>Standard Letter Comment M1A (18 reps) (Ref 993/1)</u> No examples of the details required for masterplanned areas to enable ERC residents to make an informed decision. Gives carte blanche powers to planners. No obligation to consult in reaching future planning decisions. Master plans approved in principal but not in detail which gives little benefit to residents. No guarantee loss of Green Belt sites would achieve desired objective. Not consistent with ambitions for Sustainable Economic Growth elsewhere in ERC. The proposal is likely to lead to land banking by developers waiting for good times.</p>		

Leads to stroke removal of large tracts of land from the Green belt.
 Not consistent with SHNDA.
 No mention of public consultation on supplementary guidance.
 No detail of possible future development uses.
 The Proposed LDP disenfranchises residents through master planning.
 No support in Strategic Development Plan for this policy on master planning.
 5 years too long to give permission without further consultation.

Standard Letter Comment M1B (7 reps) (Ref 994/1) - 25 years too long to give permission without further consultation.

Modifications sought by those submitting representations:

James Sandeman (Ref 600/7) - Requirement for detailed infrastructure requirement schedules.

Mactaggart and Mickel Homes Limited (Ref 703/2) - 4.2.2. insert 'ideally' between "should" and "relate".

Standard Letter Comment M1A (18 reps) (Ref 993/1)

Requirement for detailed infrastructure requirement schedules.
 LDP should remove master planned areas and 'normal' planning application process should be undertaken for sites for the next 5 years.
 Withdraw master planning
 New LDP based on 5 year period put out to consultation without large scale removal of Green Belt land.

Standard Letter Comment M1B (7 reps) (Ref 994/1) - New LDP based on 5 year period put out to consultation without large scale removal of Green Belt land.

Summary of responses (including reasons) by planning authority:

Support

Mr and Mrs P Layden and Richard Layden (Ref 86/5), Cruden Estates (Ref 248/1), Adele Gallagher, Scottish Water (Ref 256/1) - The Council acknowledges and welcomes the support for Policy M1.

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

Objections

James Sandeman (Ref 600/7), Stewart Milne Homes (Ref 500/3), Standard Letter Comment M1A (18 reps) (Ref 993/1), Standard Letter Comment M1B (7 reps) (Ref 994/1)

It was stated that the LDP should be based upon a 5 year period. However, SPP (CD/69) is clear that LDPs should set out ambitious long term visions for their area (Para 8) and be clear about the scale of anticipated change and demonstrate the underlying reasons for the preferred location and the likely sequence of development (Para 15). Para 21 of SPP states that the Plan should be reviewed at least every 5 years and should focus on what has to change rather than invite the re-opening of settled issues.

As stated under Issue 2.1.2 the Proposed Plan sets out a development strategy up to 2025 and beyond and will deliver a range of economic, social and environmental benefits to the area. In addition compliance with SPP and the Approved SDP (CD/81) is also demonstrated.

Policies M2.1: Maidenhill/Malletsheugh, M2.2: Barrhead South M2.2 and M3: Shanks/Glasgow Road are critical to the delivery of the Council's long term vision and development strategy for East Renfrewshire. To ensure the developments are carried out in a manner that delivers the Council's vision and delivers development in a sustainable way, the Plan makes it clear that the sites will be master planned. PAN 83: Masterplanning (CD/76) provides guidance on the preparation of master plans. The Council has closely followed this PAN in preparing Development Frameworks for the three master plan areas (CD/21, CD/22 and CD/23).

In line with Policy M1: Master plans, the Council has been working with the landowners, developers, key agencies and internal departments to take forward the master plan process. This approach will address the detail of many of the concerns raised by respondents. The Plan sets out the broad principles of development and the Development Frameworks followed by master plans start to build out the detail and will ensure community engagement in the process. The Development Frameworks set the planning context and provide clear guidelines for the key principles to be achieved across each individual site including integration with the existing communities of Newton Mearns and Barrhead. Many of the respondents' comments to the Proposed Plan relate to matters of detail that will be fully explored through the master plan process and through the development management process.

The Council has made significant progress and has now completed the Development Frameworks. These were Approved by East Renfrewshire Council at its meeting of 29th January 2014. They will then be developed further by the individual land owners in close consultation with the Council to prepare detailed master plans. Additional technical analysis of the sites will also be undertaken. The master plans indicate infrastructure requirements and the development contributions required. Other issues including access, sustainable transport options, green networks, phasing, design and flooding and drainage are also addressed. The master plans will be adopted by the Council as Supplementary Planning Guidance.

Full justification for each of the master plans is set out under Issues 3.3 to 3.5 and their supporting Development Frameworks.

The Council believes that community engagement will be an important element to ensure the master plans are reflective of public concern and address these concerns in a robust and effective manner. There will therefore be opportunity for public representation to the details as they emerge. The LDP process allowed community comment on the principle of the development. The detail will emerge through the master plan process and this will allow the opportunity for stakeholders to comment and shape the direction of the master plans. Furthermore at the planning application stage, there is a statutory requirement to carry out community consultation on major applications.

In relation to consultation on the LDP, there has been significant consultation undertaken at MIR, Proposed Plan and Modification stages and the DPS Participation Statement (CD/52) and Report of Conformity (CD/53) outlines this in detail. Consultation on the Draft master plans is expected to commence summer 2014. The Approved SPGs will

form part of the LDP once the Plan is Adopted.

The Strategy and master plan approach is therefore fully in compliance with SPP and PAN 83 and the Plan will be reviewed in accordance with SPP guidance.

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

Mactaggart and Mickel Homes Limited (Ref 703/2)

It is not considered necessary to include the word 'ideally' in Para 4.2.2. This would dilute the policy. The Policy is clear that proposals for areas within a master plan should not impact upon the delivery of the overall aspiration for the whole master plan area.

It is not proposed to modify the Policy in respect of the above.

Reporter's conclusions:

1. Policy M1 is one of a number of policies in the proposed plan dealing with the master planning of the strategic development opportunity areas. It states:

“Policy M1: Master plans

The council will support appropriate development within master planned areas and will prepare supplementary planning guidance to set the planning context for the development of these major sites and to bring forward their implementation.

Development within the master planned areas as defined on the proposals map will be acceptable where it conforms with the master plan and is in accordance with strategic Policies 1, 2 and 3 and Policy D1. A phasing and delivery strategy will be required for all proposals. Any application should relate to the master planned area as a whole or if less should not in any way prejudice the implementation of the whole development.”

2. In summary, adjustments are sought to the proposed plan which would: provide sufficiently detailed master plans at this stage to allow local residents to reach an informed opinion on the release of the strategic development opportunity areas; provide infrastructure requirement schedules for the master planned areas: restrict it to a 5 year period rather than a 25 year one; and insert the word ideally in the last sentence of paragraph 4.2.2 of policy M1.

3. Scottish Planning Policy sets as a policy principle that planning should take every opportunity to create high quality places by taking a design led approach. It explains that this approach should be applied at all levels, including at the local level in local development plans. Scottish Planning Policy also identifies tools for making better places, and one of these is master plans, along with design frameworks, development briefs, design guides and design statements. It indicates that, in developing a spatial strategy planning authorities should identify the most sustainable locations for longer term development and, where necessary, review the boundaries of the green belt. Planning Advice Note 83, Master Planning, indicates that the Scottish Government wishes to see a greater focus on the quality of places, and that effective master planning can make a contribution to the creation of sustainable and successful places.

4. Policy M1 in the proposed plan sets the overall context for the development of the master planned areas. Requirements for master planned areas are set out in Policies M2, M2.1, M2.2, and M3. The proposed plan also provides a suite of policies which will

assist in the preparation of master plans, and which will provide a framework for assessing detailed proposals when they come forward. I believe that the proposed plan reasonably fulfils its role of setting the requirements that will underpin the development of the master plan areas. It is unrealistic and unnecessary to expect the requirements, or detailed infrastructure schedules, to be set out in great detail at this early stage. Given the generally long lead in times for developments of this scale, it is likely that the requirements will evolve and be adjusted to allow new issues to be addressed as they emerge. I note that the planning authority has built on the proposed plan by setting out broad principles of development in development frameworks for the master planned areas, and that these, along with the proposed plan, will inform the more detailed master plans, and any development briefs, that will be prepared as supplementary guidance. In general terms, I am satisfied that the planning authority are broadly in line with the process set out in national guidance and advice for better designed places.

5. The proposed plan sets out a spatial strategy for the development of the area, and it shows the planning authority's settled view on green belt boundaries. Larger scale developments such as those proposed here are generally longer term, and this should help in providing robust and defensible green belt boundaries, which should endure. I consider that large scale developments can be an appropriate part of a spatial strategy, and am satisfied that they can justifiably involve a review of existing green belt boundaries. The contention that land banking is likely to result has not been substantiated, and I note that Policy M1 includes a requirement for a phasing and delivery strategy to be submitted for all proposals. Larger scale developments can span more than one local development plan. Their progress and any change of circumstances can be assessed at each review of the plan. It may be possible to justify further green belt releases in the future, but they would need to be considered against the policy framework in place at the time. The proposals are not out of step, or inconsistent, with national guidance or the general thrust of the Glasgow and Clyde Valley Strategic Development Plan. I am not persuaded that the provision of more detailed information on the proposals would have significantly helped in considering the principle of developing these larger scale sites.

6. I note that there has been an opportunity to make representations on the larger scale development proposals in the proposed plan, and that they have been considered at this examination. The planning authority explains that there will be opportunities for further public representations at later stages in the process. I consider this to be a reasonable approach.

7. I do not believe that it would be appropriate to introduce the word ideally into the last sentence of paragraph 4.2.2 of Policy M1 because it would introduce a degree of uncertainty in the planning and delivery of the objectives for the master planned areas.

8. Overall, no adjustments are required to the proposed plan.

Reporter's recommendations:

No modifications.

Issue 3.2	Master Plan M77 Strategic Development Opportunity	
Development plan reference:	Policy M2: Master Plan M77 Strategic Development Opportunity	Reporter: Richard Dent
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>George M Morton (Ref 38/1) (Ref 38/2) (Ref 38/4) SEPA (Ref 70/38) (Ref 70/42) (Ref 70/52) (Ref 70/53) James Whyteside (Ref 82/10) Joseph Fell (Ref 87/2) (Ref 87/3) Mr and Mrs William Reid (Ref 95/1) (Ref 95/2) Isobel Jane Gallacher (Ref 130/1) Robert Johnston (Ref 131/2) (Ref 131/1) Janet Mylett (Ref 191/2) Norman Gray (Ref 214/1) (Ref 214/2) Robert Russell (Ref 215/1) (Ref 215/2) Sheila Greenshields (Ref 217/1) Dawn Roberts (Ref 225/1) Margaret Gray (Ref 231/3) Iain Donaldson (Ref 252/2) Scottish Water (Ref 256/10) Personal Pension Trust (Ref 274/1) (Ref 274/2) (Ref 274/4) Education Department, East Renfrewshire Council (Ref 275/5) Ron Burkey (Ref 279/1) Norman Graham (Ref 286/4) (Ref 286/9) (Ref 286/11) (Ref 286/12) Martin and Lynn Smith (Ref 296/1) (Ref 296/2) Dr Archie Bethel CBE (Ref 361/1) (Ref 361/2) Jane Donaldson (Ref 375/2) Ian Gladstone (Ref 380/4) Claire Wharton (Ref 419/4) Mrs Irene Graham (Ref 448/3) Sam Taylor, Glasgow City Council (Ref 465/4) W.R Barr (Ref 470/4) (Ref 470/5) Scott Graham, McInally Associates Ltd on behalf of Stewart Milne Homes (Ref 500/1) (Ref 500/3) (Ref 500/11)</p>	<p>Andrew Gray (Ref 501/1) Whitecraigs Village Ltd (Ref 502/1) (Ref 502/2) Thornliebank Community Council (Ref 504/1) Lynda Murray (Ref 511/3) (Ref 511/10) (Ref 511/11) (Ref 511/12) Keith A Vallance (Ref 536/3) Edward Gunn (Ref 651/2) Newton Mearns Community Council (Ref 686/4) Julie Mylett (Ref 704/2) Barbara Fewkes (Ref 705/1) (Ref 705/2) Kate Makrides (Ref 706/2) Persimmon Homes Ltd (Ref 743/2) Homes for Scotland (Ref 758/3) Persimmon Homes and Elphinstone Barcapel Ltd (in administration) (Ref 773/1) (Ref 773/2) Patterton SPV (Ref 776/1) Fergus Muirhead (Ref 780/1) (Ref 780/2) Mansell Homes (Ref 781/1) D Jesner (Ref 783/6) Iain McCowan (Ref 896/4) (Ref 896/11) Carol A Gilbert, SPT (Ref 969/1)</p>	
Provision of the development plan to which the issue relates:	<p>Appendix 1 - Standard Letters Standard Letter Comment SG2.7A (51 reps) (Ref 1007/1) Standard Letter Comment SG2.7B (16 reps) (Ref 1008/1) Standard Letter Comment SG2.7C (3 reps) (Ref 1009/1) Standard Letter Comment SG2.8A (52 reps) (Ref 1010/1) Standard Letter Comment SG2.8B (18 reps) (Ref 1011/1) Standard Letter Comment SG2.8C (3 reps) (Ref 1012/1)</p> <p>Chapter 4: Key Areas for Change and Settlement Strategies Para. 4.3 – 4.4.1 – M77 Master Plan Strategic Development Opportunity Figure 5: Policy M77 Master Plan M77 Strategic Development Opportunity</p>	

	Action Programme SG2.7: Hillfield SG2.8: Barcapel and LDP24A: Barcapel SG6.13 and SG6.22: Netherplace Works SGG10.3: Balgray Link SG10.11: Aurs Road SG10.12: Crookfur Road/M77
Planning authority's summary of the representation(s):	
<p><u>(a) Policy M2: M77 Strategic Development Opportunity Support</u></p> <p><u>Scottish Water (Ref 256/10)</u> - Support and will work closely with Local Authority and participate in the masterplan process.</p> <p><u>Education Department, East Renfrewshire Council (Ref 275/5)</u> Addresses the need for additional primary schools with pre-five provision an early priority. It is important Plan recognises future provision will continue to be monitored. Examining future provision will be required to ensure sufficiency of education places as development within the LDP take place. In Newton Mearns and Barrhead South capacity can be managed subject to appropriate development contributions. The Action Programme and review of LDP will allow schools estate to be monitored and any needs addressed.</p> <p><u>SPT (Ref 969/1)</u> Pleased to note comments on MIR have informed strategy Note provision of public transport improvements to serve medium and long term development, will assist in bus solutions supported by developer contributions</p> <p><u>General</u></p> <p><u>Glasgow City Council (Ref 465/4)</u> The proposal to undertake a master plan for the M77 Corridor is noted. Glasgow City Council would anticipate consultation with East Renfrewshire Council during the development of the master plan, particularly in relation to the development of any proposals which could impact upon the Dams to Darnley Country Park, and on Glasgow's economic development offer.</p> <p><u>Objection</u></p> <p><u>George M Morton (Ref 38/4)</u> No reason for including land to the east of Patterton roundabout - reduces protection of Green Belt in the future and increases potential for coalescence Major housing envisaged has no social or economic benefit Prime agricultural land</p> <p><u>James Whyteside (Ref 82/10)</u> Not an area of less environmental quality and sensitivity - historical pedigree aligned to natural features and watercourses enjoyed by walkers, golfers and cyclists. Significant negative effects on the local environment through development. Where are appropriate development contributions? - plans inadequacy in solving</p>	

problems self created by the plan such as schools.
 Encouraging commercial and leisure on keys sites destroys their function.
 Site contradictory to policies: SP1, SP2 D5, 6.2 Housing Supply, SG6, E4.

Janet Mylett (Ref 191/2)

Existing infrastructure - schools, drainage, transport, roads GP surgeries needs to be thoroughly planned before any additional housing is planned.
 Promise of protecting the green belt is meaningless.

Dawn Roberts (Ref 225/1)

Plan compromises East Renfrewshire's amenities and access to green space and fields
 Overbuilding without comparative investment in local infrastructure
 Enough areas which can be built on without destroying Green Belt
 Against incinerator.

Ron Burkey (Ref 279/1)

Brownfield sites should be used first and sites already with planning permission developed first
 Current poor state of roads will be made worse by 3000 extra cars and will have no chance to improve
 Schools already at capacity - require 2 new primary and 2 new secondary
 Who will pay for new schools and all changes from development?
 Little regard given to flooding - houses built at Cheviot Drive demonstrate this
 New health centre at Drumby Crescent in wrong place and will be required in Newton Mearns when the development goes ahead
 Loss of rural character
 Community does not want businesses growing up
 Waste incinerator under guise of this development
 ERC and elected councillors should be more active in presenting plans at public meetings

Norman Graham (Ref 286/4)

Contrary to SDP
 Contrary to LDP policy SP2

Claire Wharton (Ref 419/4)

Green Belt release contrary to SDP, Brownfield not used first
 In conflict with SP2 Brownfield first, sequential approach not demonstrated, conflict with trunk and local roads, GSO would not provide defensible Green Belt boundary due to permission for motorway services

Irene Graham (Ref 448/3)

Contrary to SDP and compact city region
 Contrary to other LDP policies SP2

Stewart Milne Homes (Ref 500/1) (Ref 500/3)

(500/1) - Identification of the areas covered by the M77 SDO (M2) are fundamentally the wrong locations to promote substantial growth based on landscape, transport and planning issues.

Landscape: Greenbelt Landscape Character Assessment 2005 identifies sites within the M2 area (LDP42 Lyoncross, LDP44 Springhill/Springfield Road and LDP12A/B Maidenhill) as Priority Areas for Landscape Protection but these have still been allocated
 It also identifies areas along the urban edge for small scale development only

The Site Evaluation states the Greenbelt Landscape Character Assessment 2005 has been used but this is not apparent

Scale of development and cumulative impact are important for this area and seem to have been missed in preparation of the plan.

The Plan relies heavily on releasing several large sites of questionable effectiveness and substantial infrastructure costs (when alternatives exist) in order to pursue other objectives Para 4.3.1., bullet 1, is refuted in that development sites have not been directed to areas of less environmental quality and sensitivity that will provide defensible Green Belt boundaries

Transport: no business case for Balgray Link Road, considerable financial cost and will exacerbate traffic on M77 – detailed cumulative impact on traffic has not been done
Concerned Balgray Link Road is to be phased and linked to Country Park development.
Surely if required for housing it should be developed first

Planning: M77 Masterplan Report states that the current planning policy framework is not necessarily supportive of the vision in the masterplan. The SDP, through the HNDA communicates concerns with regard to significant Green Belt release and strategic housing allocations.

Alternative Green Belt residential release sites exist and the sites within the M77 SDP have been chosen in order to pursue other objectives.

(Ref 500/3) - Object to approach followed with site M2

Thornliebank Community Council (Ref 504/1)

Support the concerns of other community councils over loss of Green Belt, more housing, school places, busy roads and lack of youth entertainment and amenities.

It is hard to see why education department do not foresee need for further secondary school spaces

Lynda Murray (Ref 511/3)

Contrary to LDP policy SP2 :

Brownfield sites with planning permission exist and other Brownfield sites could be brought forward or where land is unproductive

no positive economic benefits, no demand for business sites in area, Greenlaw promoted previously was not successful

Adverse impact on Roads

GSO not a defensible Green Belt boundary, would put further pressure on Green Belt, Motorway services demonstrate this.

Keith A Vallance (Ref 536/3)

Policy contrary to stated consolidation approach and will have significant adverse effect on environment, infrastructure, community and education facilities.

Object to business use as this is contrary to SDP

Lack of demand for business in this location

Newton Mearns Community Council (Ref 686/4)

Contrary to SDP - not creating compact city region, not brownfield, does not increase urban density, is a major Green Belt release

SDP demonstrates ample supply of Brownfield

Contrary to LDP policy SP2- Brownfield sites available not used, will not attract businesses based on previous sites e.g. Greenlaw, adverse impact on roads, does not provide defensible Green Belt boundary

Data does not support release of additional sites in Newton Mearns in the next 5 years

SG1.27 Ayr Road/Cheviot Drive has consent but is on functional flood plain

Julie Mylett (Ref 704/2)

Schools not considered
Green Belt loss

Homes for Scotland (Ref 758/3)

Unnecessarily constrained through phasing -Build rate affects money release and viability
LDP has set housing land below HNDA, if plan reflected HNDA there would be no need for artificial phasing SDOs hard to implement, additional requirements cause delays, funding hard to secure

Iain McCowan (Ref 896/4)

Contrary to SDP
Contrary to LDP policies, specifically SP2

(b) Policy SG6.13 and SG6.22 Netherplace Works, Newton Mearns (Policy M2)**Support****Personal Pension Trust (Ref 274/1) (Ref 274/4)**

(Ref 274/1) Assists in safeguarding of areas use for the lifetime of the plan.

Keen to ensure ER continues to recognise and support the future potential as a business/industrial site or consideration of other uses suitable for this location if the site was no longer required for its original purpose.

(Ref 274/4) Support inclusion of Mearns Park site within SDO and promote Mearns Park for investment/ development.

Objections

SEPA (Ref 70/38) Julie Gerc, SEPA (Ref 70/42) - Assessment of flood risk required.

Personal Pension Trust (Ref 274/4)

Object to inclusion of Mearns Park (SG6.22) in Green Belt when it has been recognised as an employment/industrial use.

Would restrict future development of site

National policy states that major business/industrial organisations should not be designated within a Green Belt location.

Site not important within the wider Green Belt and does not enhance the setting.

Whitecraigs Village Ltd (Ref 502/1) (Ref 502/2)

(Ref 502/1) Plan should identify Netherplace Works as a business proposal as per SG6.22 suitable for redevelopment as a care home, retirement village and associated facilities.

(Ref 502/2) We would suggest that the reference to Netherplace Works, Newton Mearns at SG6.22 is expanded to include the following:

“Brownfield Opportunity site suitable for re-use as a care home, retirement village and associated facilities”

(c) Policy SG10.11 Aurs Road, Newton Mearns**Support**

Lynda Murray (Ref 511/11) - Support alignment of dangerous bend

Objection

SEPA (Ref 70/52) - Assessment of flood risk required.

(d) Policy SG10.12 Crookfur Road/M77, Newton Mearns**Support**

Margaret Gray (Ref 231/3) - Support Junction 4 enhancement to improve noise, safety and condition of roads in Newton Mearns

Andrew Gray (Ref 501/1) - Support as impractical to direct traffic to J5

Lynda Murray (Ref 511/12) - Support junction enhancement

Objection

SEPA (Ref 70/53) - Assessment of flood risk required.

(e) Policy SG10.3 Balgray Link - Balgraystone Road, Barrhead**Objection**

Iain Donaldson (Ref 252/2) - Would lead to further traffic on M77

Norman Graham (Ref 286/9)

Not sustainable

Would not improve connectivity but add extra mileage and congestion.

Jane Donaldson (Ref 375/2) - Would lead to further traffic on M77

Ian Gladstone (Ref 380/4) - No identified need for the road to justify loss of Green Belt and environmental damage

Lynda Murray (Ref 511/10) - Not sustainable would add congestion and emissions to M77

Edward Gunn (Ref 651/2)

Unsustainable

Causes congestion, pollution at J5 M77

Kate Makrides (Ref 706/2)

Would cause merging of settlements

Increase congestion to M77 J5

Air pollution

D Jesner (Ref 783/6)

Contravenes policy on sustainability and reduction in car use

Would not improve connectivity but add to pollution and congestion

Iain McCowan (Ref 896/11)

Not sustainable

Would increase congestion at J5

Actively assists incinerator

(f) Policy SG2.7 Hillfield, Newton Mearns**Support****Patterton SPV (Ref 776/1)**

Support allocation for housing and release from Green Belt

Options for delivering affordable housing:

1. Mixed tenure - social rent, mid-market rent, share equity
2. Social rent (funding required)

Mansell Homes (Ref 781/1) - Support allocation of site on behalf of developer

Objections**George M Morton (Ref 38/1)**

Encroachment onto sensitive part of Green Belt and Green Corridor

Reduces separation between Newton Mearns

Reporter at Greenlaw inquiry stated there should be no further encroachment in this area

Rejected appeal 2009/0071/TP was because of coalescence

MIR site reduced 12.5HA to 4.3HA, now increased to 6.8HA

Access issues compromise safety of Capelrig Road

Site Evaluation scoring altered to more favourable from MIR scoring despite only being reduction in site size

Site evaluation takes no account of access problems

Robust and defensible Green Belt boundary cannot be created artificially

Goes against Q3 of Methodology Statement in Site Evaluation

Increased pressure on services and infrastructure

no social, cultural or economic benefits to the residents of Newton Mearns

SNH MIR objection "particularly sensitive part of the green belt which functions as a green wedge; very worst encroachment of the Green Belt; Completely at variance with all previous and current planning guidelines."

Sites SG2.7/SG2.8 should be first priority in restoration of Green Belt classification if sequential approach used.

Joseph Fell (Ref 87/2) - Do not support allocation

Mr and Mrs William Reid (Ref 95/1)

Infrastructure not in place to handle the existing expansion

LDP23b and LDP24b are in a particularly sensitive area

It was stated by a planning officer at the last Local Plan inquiry Capelrig Road is the defensible Green Belt boundary

Objection on grounds of sewage problems. Drainage cannot cope at present and raw sewage has flower into Capelrig Road and Rouken Glen Park

Access to site dangerous, fixed railway bridge and blind corner

Effect on services - Eastwood High School replacement has same capacity as old

Isobel Jane Gallacher (Ref 130/1) - Sensitive site should be last part of Green Belt to be utilised

Robert Johnston (Ref 131/2)

Access issues - width of road, footpath, topography, low rail bridge, four phase traffic management system

Public transport access- Patterton Station at capacity, single decker bus infrequent, affordable housing occupants further away and may not have access to a car

Traffic census by developer is out of date

Roads in area at capacity

Inner Green Belt loss probability of coalescence

Reference made to development breaching strong Green Belt boundaries

Change in Site Evaluation scoring unexplained

Would cause landlocking at Barcapel

Level of visibility from site plan not in keeping with site evaluation requirements

Norman Gray (Ref 214/1)

Against LDP para 3.2.1 'settlement will be able to accommodate planned growth', already extensive housing at Greenlaw

Against para 3.4.2 adverse impact on social, physical and environmental infrastructure

Against para 5.2.1 loss of character

Reporter at last Local Plan said these sites should not be developed

Coalescence

Applications for Hillfield previously rejected

From large number of responses clear residents are against development

MIR comments including those by Scottish natural heritage and 1000 residents not taken into account

Monitoring Statement Table D1.1 supports the retention of this visual barrier

Plan contrary to reasons people live in Newton Mearns

No detailed consideration of infrastructure

Little contribution to the area

Education facilities at capacity

Robert Russell (Ref 215/2)

M2 specific site SG2.7

Hillfield should be retained as Green Belt:

Encroachment onto sensitive site in Green Belt, visual prominence

No suitable access to site, site reduction from Local Plan means no access to Stewarton Road, sole access from Capelrig Road dangerous, impacts on residents. Site Evaluation takes no note of access, part of master plan site connected by narrow and unclassified road with through traffic restricted by railway bridge.

Still farmed, valuable agricultural land

Green corridor separating Newton Mearns from other settlements

In Planning Inquiry for Greenlaw site Reporter said there should be no more land release at this location

North east boundary undefined by landscape features, removal from Green Belt leaves a weak indefensible boundary, contrary to the Environment Theme in Table 2 which states "ensure any green belt releases provide a strong defensible green belt boundary"

Site contributes to separation between Newton Mearns and adjacent urban settlements and prevents coalescence

Goes against LDP Monitoring Statement Landscape Capacity Assessment Table D1.1, Appendix D1 - where medium landscape and visual sensitivity/strong landscape value/

visually prominent etc listed

Adverse impact for residents, road and rail users

Adverse impact on pre-existing traffic congestion

Adverse impact on over-stretched school capacity

Adverse effect on water and sewerage infrastructure, information from Scottish Water confirms issues in adjacent postcode

Site suffers from rail noise

Development of site would have no social, cultural or economic benefit to the residents of Newton Mearns

Norman Graham (Ref 286/11) - Coalescence

Martin and Lynn Smith (Ref 296/1)

Object to release of Green Belt/erosion of robust Green Belt

Coalescence (Newton Mearns/Glasgow/Deaconsbank)

Capelrig town boundary should be maintained

No justification for further housing

Areas of Greenlaw remain undeveloped

Impact on traffic, schools, services and wildlife

Dr Archie Bethel CBE (Ref 361/1)

Green Belt release despite assurances of no further release until other sites developed

Sites currently prevent coalescence

Loss of character and distinction from other areas

Brownfield and Greenfield sites designated for development that are still to be developed

Planning applications accepted before LDP finalised - meaning decisions have already been made

Will Council be arranging for session with residents, Councillors, MPs and MSPs?

W R Barr (Ref 470/4)

Need to protect Green Belt buffer to Glasgow

Outwith Greenlaw community growth area

Will 'piggyback' Greenlaw's infrastructure

Impact on road network

Inadequate access arrangements

Stewart Milne Homes (Ref 500/11)

Identified as requiring conservation in the Green Belt Landscape Character Assessment

Site intrudes into Green Belt as all boundaries are undeveloped, potential for coalescence

Release would reduce effectiveness of retained areas of Green Belt in providing landscape setting and individual identity

No development should take place north of railway line to prevent coalescence

Difficult access, visibility, traffic signals would be required,

Transport Assessment based on 2009 figures which do not include substantial development since this time and are therefore inaccurate

No frequent bus services within 400m

Poor access to schools/services

Significant length of off-site water mains required to connect development

Barrance Farm should be considered.

Barbara Fewkes (Ref 705/1)

Impact on house prices
 Impact on congested traffic
 Should use Brownfield sites first
 Loss of defensible Green Belt boundary
 Urban sprawl
 Not in interest of community, area or environment
 Is social housing required in this area
 Lack of amenities, creating traffic pollution
 Nothing to encourage walking or cycling

Fergus Muirhead (Ref 780/1) - I believe that there is sufficient development in this part of Newton Mearns and further development as proposed will spoil an area of natural beauty.

Standard Letter Comment SG2.7A (51 reps) (Ref 1007/1)

Sensitive site should be last part of Green Belt to be utilised
 Hillfield should be retained as Green Belt:
 Encroachment onto sensitive site in Green Belt, visual prominence
 No suitable access to site, site reduction from Local Plan means no access to Stewarton Road, sole access from Capelrig Road dangerous, impacts on residents.
 Site Evaluation takes no note of access, part of masterplan site connected by narrow and unclassified road with through traffic restricted by railway bridge
 Still farmed, valuable agricultural land
 Green corridor separating Newton Mearns from other settlements
 In Planning Inquiry for Greenlaw site Reporter said there should be no more land release at this location
 North east boundary undefined by landscape features, removal from Green Belt leaves a weak indefensible boundary, contrary to the Environment Theme in Table 2
 Site contributes to separation between Newton Mearns and adjacent urban settlements and prevents coalescence
 Goes against LDP Monitoring Statement Landscape Capacity Assessment Table D1.1 and Appendix D1 - where medium landscape and visual sensitivity/strong landscape value/ visually prominent etc listed
 Adverse impact for residents, road and rail users
 Adverse impact on pre-existing traffic congestion
 Adverse impact on over-stretched school capacity
 Adverse effect on water and sewerage infrastructure/information from Scottish Water confirms issues in adjacent postcode
 Site suffers from rail noise
 Development of site would have no social, cultural or economic benefit to the residents of Newton Mearns

Standard Letter Comment SG2.7B (16 reps) (Ref 1008/1)

Sensitive site should be last part of Green Belt to be utilised
 Site Evaluation Assessment - Amend site scoring LDP 23 (SG2.7)
 Q3 score change to -3
 Overall recommendation change to retain as Green Belt.

Standard Letter Comment SG2.7C (13 reps) (Ref 1009/1)

Against objectives of LDP
 Unnecessary development in Green Belt

Not Brownfield as in national/local policy
 Lack of infrastructure
 Developers will not pay for all infrastructure required
 Dormitory development removed from transport links
 Buffer between Glasgow and ER and should be protected
 Will piggyback on Greenlaw's infrastructure, unsustainable
 Pressure on road network
 Poor access
 Drainage/flooding

(g) Policy SG2.8 Barcapel, Newton Mearns

Support

Persimmon Homes Ltd (Ref 743/2)

Persimmon Homes wish to take this opportunity to support the residential allocation within the Proposed Local Development Plan of land at Barcapel, Newton Mearns.
 This site is zoned in the current Local Plan as 'Greenbelt'.

We support the proposed allocation of Barcapel for housing development within the emerging East Renfrewshire Local Development Plan and that this should be recognised through an appropriate allocation.

The proposed allocation of land at Barcapel for housing is supported for the following reasons:

- the site has no environmental or historical designations which would restrict development
- the site is within close proximity to public transport and local facilities and services
- the development of the land would create a logical expansion for housing development within this area.
- the site is in the hands of a recognised housebuilder who can guarantee delivery

Persimmon Homes and Elphinstone Barcapel Ltd (in administration) (Ref 773/1) -

Support inclusion of part site but object to non-inclusion of LDP24B

Objections

George M Morton (Ref 38/2)

Site Evaluation scores altered from MIR-7 and -4 to -6 and -3, nothing has changed in the interim to justify alterations

Presumption that the current planning application is the first phase of a larger scheme for 400 houses, developer response to MIR promotes larger site

Access issues pedestrian and vehicular

Increased pressure on services and infrastructure no social, cultural or economic benefits to the residents of Newton Mearns

Major housing development will have a major impact on area inappropriate to locality landlocks and sterilises agricultural land making the case for more housing in the future with no areas robust and defensible, urbanisation of Green Corridor.

SNH MIR objection "particularly sensitive part of the green belt which functions as a green wedge; very worst encroachment of the Green Belt; Completely at variance with all previous and current planning guidelines."

LDP Site Evaluation Report Q3 of Methodology page 4 against site.

Sites SG2.7/SG2.8 should be first priority in restoration of Green Belt classification if sequential approach used.

Joseph Fell (Ref 87/3) - Do not support allocation

Mr and Mrs William Reid (Ref 95/2)

Infrastructure not in place to handle the existing expansion

LDP23b and LDP24b are in a particularly sensitive area

It was stated by a planning officer at the last Local Plan inquiry Capelrig Road is the defensible Green Belt boundary

Objection on grounds of sewage problems. Drainage cannot cope at present and raw sewage has flowed into Capelrig Road and Rouken Glen Park

Access to site dangerous, fixed railway bridge and blind corner

Robert Johnston (Ref 131/1)

Access issues - width of road, footpath, topography, low rail bridge, four phase traffic management system

Public transport access- Patterton Station at capacity, single decker bus infrequent, affordable housing occupants further away and may not have access to a car

Traffic census by developer is out of date

Roads in area at capacity

Inner Green Belt loss probability of coalescence

Reference made to development breaching strong Green Belt boundaries

Change in Site Evaluation scoring unexplained

Would cause landlocking at Barcapel

Level of visibility from site plan not in keeping with site evaluation requirements

Norman Gray (Ref 214/2)

Against LDP para 3.2.1 'settlement will be able to accommodate planned growth', already extensive housing at Greenlaw

Against para 3.4.2 adverse impact on social, physical and environmental infrastructure

Against para 5.2.1 loss of character

Reporter at last Local Plan said these sites should not be developed

Coalescence

Applications for Hillfield previously rejected

From large number of responses clear residents are against development

MIR comments including those by Scottish natural heritage and 1000 residents not taken into account

Monitoring Statement Table D1.1 supports the retention of this visual barrier

Plan contrary to reasons people live in Newton Mearns

No detailed consideration of infrastructure

Little contribution to the area

Education facilities at capacity

Robert Russell (Ref 215/1)

Policy M2 and site SG2.8

Site is part of master plan site connected by narrow and unclassified road with through traffic restricted by railway bridge.

Site should be removed from Schedule 11 and retained as Green Belt:

Encroachment onto sensitive site in Green Belt

Site contributes to separation between Newton Mearns and adjacent urban settlements and prevents coalescence

Removal from Green Belt leaves a weak indefensible boundary, contrary to the Environment Theme in Table 2 which states "ensure any green belt releases provide a strong defensible green belt boundary"

Goes against LDP Monitoring Statement Landscape Capacity Assessment Table D1.1, Appendix D1 - where medium/high landscape and visual sensitivity/strong landscape value/visually prominent etc listed

Development would lead to further development on Barcapel Fields (site LDP24A)

Still farmed, valuable agricultural land

Green corridor separating Newton Mearns from other settlements

In Planning Inquiry for Greenlaw site Reporter said there should be no more land release at this location

Larger version of site previously rejected by Reporter

Large addition when combined with recent Capelrig Road site on a population scale with - 3 Uplawmoors, 1.5 Waterfoots or 2/3rds Eaglesham

Significant visual impact particularly from rail line

Access poor/dangerous access to site

major impact on pre-existing traffic congestion

pedestrian and cycle access will impede on traffic flow at Capelrig Road

Bus access poor and will be restricted by low rail bridge

impact on infrastructure/services - adverse impact on over-stretched school

capacity/adverse effect on water and sewerage infrastructure

site suffers from rail noise

development of site would have no social, cultural or economic benefit to the residents of Newton Mearns.

Sheila Greenshields (Ref 217/1) - Formally object to removal of Green Belt.

Norman Graham (Ref 286/12) – Coalescence

Martin and Lynn Smith (Ref 296/2)

Object to release of Green Belt/erosion of robust Green Belt

Coalescence (Newton Mearns/Glasgow/Deaconsbank)

Capelrig town boundary should be maintained

No justification for further housing

Areas of Greenlaw remain undeveloped

Impact on traffic, schools, services and wildlife

Dr Archie Bethel CBE (Ref 361/2)

Green Belt release despite assurances of no further release until other sites developed

Sites currently prevent coalescence

Loss of character and distinction from other areas

Brownfield and Greenfield sites designated for development that are still to be developed

Planning applications accepted before LDP finalised - meaning decisions have already been made

Will Council be arranging for session with residents, Councillors, MPs and MSPs?

W R Barr (Ref 470/5)

Need to protect Green Belt buffer to Glasgow

Outwith Greenlaw community growth area

Will 'piggyback' Greenlaw's infrastructure

Impact on road network

Barbara Fewkes (Ref 705/2)

Impact on house prices
 Impact on congested traffic
 Should use Brownfield sites first
 Loss of defensible Green Belt boundary
 Urban sprawl
 Not in interest of community, area or environment
 Is social housing required in this area
 Lack of amenities, creating traffic pollution
 Nothing to encourage walking or cycling

Persimmon Homes and Elphinstone Barcapel Ltd (in administration) (Ref 773/2)

Non- inclusion of site
 175 units
 Second phase to SG2.8
 Can be delivered short term
 Site is effective
 Object to D3 protection of site
 Too reliant on M2.1 to deliver large number of units
 Not enough sites in LDP to address shortfall
 Should promote additional private housing to make up affordable shortfall
 Phasing issues
 M2.2 delivery issues
 Presumption in favour of Council owned sites in Site Evaluation
 Over reliance on established housing land supply
 Not 5 year effective land supply

Fergus Muirhead (Ref 780/2) - I believe that there is sufficient development in this part of Newton Mearns and further development as proposed will spoil an area of natural beauty.

Standard Letter Comment SG2.8A (52 reps) (Ref 1010/1)

Site should be removed from Schedule 11 and retained as Green Belt:
 Encroachment onto sensitive site in Green Belt/Sensitive site should be last part of Green Belt to be utilised
 Site contributes to separation between Newton Mearns and adjacent urban settlements and prevents coalescence
 Removal from Green Belt leaves a weak indefensible boundary, contrary to the Environment Theme in Table 2 which states ensure any green belt releases provide a strong defensible green belt boundary
 Goes against LDP Monitoring Statement Landscape Capacity Assessment Table D1.1, Appendix D1 - where medium/high landscape and visual sensitivity/strong landscape value/visually prominent etc listed
 Development would lead to further development on Barcapel Fields (site LDP24A)
 Still farmed, valuable agricultural land
 Green corridor separating Newton Mearns from other settlements
 In Planning Inquiry for Greenlaw site Reporter said there should be no more land release at this location
 Larger version of site previously rejected by Reporter
 Large addition when combined with recent Capelrig Road site on a population scale with - 3 Uplawmoors, 1.5 Waterfoots or 2/3rds Eaglesham
 Site is part of master plan site connected by narrow and unclassified road with through

traffic restricted by railway bridge
 Significant visual impact particularly from rail line
 Access poor/dangerous access to site
 major impact on pre-existing traffic congestion
 pedestrian and cycle access will impede on traffic flow at Capelrig Road
 Bus access poor and will be restricted by low rail bridge
 impact on infrastructure/services - adverse impact on over-stretched school
 capacity/adverse effect on water and
 sewerage infrastructure
 site suffers from rail noise
 Development of site would have no social, cultural or economic benefit to the residents of
 Newton Mearns.
 Site Evaluation Assessment - Amend site scoring LDP 24 (SG2.8), Q3 score change to -
 3, Overall recommendation change to retain as Green Belt

Standard Letter Comment SG2.8B (18 reps) (Ref 1011/1)

Sensitive site should be last part of Green Belt to be utilised
 Site Evaluation Assessment - Amend site scoring LDP 24 (SG2.8)
 Q3 score change to -3
 Overall recommendation change to retain as Green Belt.

Standard Letter Comment SG2.8C (3 reps) (Ref 1012/1)

Against objectives of LDP
 Unnecessary development in Green Belt
 Not Brownfield as in national/local policy
 Lack of infrastructure
 Developers will not pay for all infrastructure required
 Dormitory development removed from transport links
 Buffer between Glasgow and ER and should be protected
 Will piggyback on Greenlaw's infrastructure, unsustainable
 Pressure on road network
 Poor access
 Drainage/flooding

Modifications sought by those submitting representations:

(a) Policy M2: M77 Strategic Development Opportunity

**George M Morton (Ref 38/4), James Whyteside (Ref 82/10), Janet Mylett (Ref 191/2),
 Dawn Roberts (Ref 225/1), Ron Burkey (Ref 279/1), Norman Graham (Ref 286/4),
 Claire Wharton (Ref 419/4), Irene Graham (Ref 448/3), Thornliebank Community
 Council (Ref 504/1), Lynda Murray (Ref 511/3), Keith A Vallance (Ref 536/3, Newton
 Mearns Community Council (Ref 686/4), Julie Mylett (Ref 704/2), Iain McCowan (Ref
 896/4)**

Delete Policy M2 master plan area and retain land as Green Belt.
 Strategy should focus on delivery of Brownfield sites only.
 Proposed Strategy will result in negative impacts upon infrastructure (roads, schools,
 drainage), the environment and will not deliver social or economic benefits.
 Incinerator proposal should not be supported

Stewart Milne Homes (Ref 500/1) (Ref 500/3)

The sites within the M77 Strategic Development Opportunity should not be identified as

residential release sites. An alternative strategy should be adopted based on transport and landscape issues which promotes the release of a greater number of smaller more appropriate, more effective and dispersed green belt sites, including sites LDP08 and LDP10 at Barrance Farm, Newton Mearns.

Alternative sites exist as Barrance Farm, Newton Mearns which is smaller and more effective. An overall roof tax should be implemented to pay for the Balgray Link Road (should the council pursue this), Country Park improvements, community facilities etc.

Homes for Scotland (Ref 758/3)

Preferable to remove the artificial phasing of housing numbers. The full numbers are justified by the GCV HNDA and Strategic Plan all-tenure requirement. Allowing development to accord with market demand is a far better approach than artificial phasing constraints. More development will increase the scope for more affordable housing, even if it has to be developer-led provision at a lower percentage rate than 25% to reflect the fact that it will be unsubsidised or other tenures than social-rented.

It would be preferable for the relevant sentence in each policy to read:

“Approximately XXXX homes to be built in accordance with a delivery programme based on a viable approach to meeting developer obligations”

(b) Policy SG6.13 and SG6.22 Netherplace Works, Newton Mearns (Policy M2)

SEPA (Ref 70/38) (Ref 70/42) - Flood Risk Assessment required.

Personal Pension Trust (Ref 274/4) - Green Belt boundary should be reviewed and Mearns Park taken out.

Whitecraigs Village Ltd (Ref 502/1) (Ref 502/2)

Plan should identify Netherplace Works as a business proposal as per SG6.22 suitable for redevelopment as a care home, retirement village and associated facilities.

Reference to Netherplace Works, Newton Mearns at SG6.22 is expanded to include the following:

“Brownfield Opportunity site suitable for re-use as a care home, retirement village and associated facilities”

(c) Policy SG10.11 Aurs Road , Newton Mearns

SEPA (Ref 70/52) - Flood Risk Assessment required.

(d) Policy SG10.12 Crookfur Road/M77, Newton Mearns

SEPA (Ref 70/53) - Flood Risk Assessment required.

(e) Policy SG10.3 Balgray Link - Balgraystone Road, Barrhead

Iain Donaldson (Ref 252/2), Norman Graham (Ref 286/9), Jane Donaldson (Ref 375/2), Ian Gladstone (Ref 380/4), Lynda Murray (Ref 511/10), Edward Gunn (Ref 651/2), Kate Makrides (Ref 706/2), D Jesner (Ref 783/6), Iain McCowan (Ref 896/11)

Delete proposal from Schedule 17 as it would lead to increased congestion and pollution on M77/J5 and would not improve connectivity between Newton Mearns and Barrhead.

(f) Policy SG2.7 Hillfield, Newton Mearns

George M Morton (Ref 38/1), Joseph Fell (Ref 87/2), Mr and Mrs William Reid (Ref 95/1), Isobel Jane Gallacher (Ref 130/1), Robert Johnston (Ref 131/2), Norman Gray (Ref 214/1), Robert Russell (Ref 215/2), Norman Graham (Ref 286/11), Martin and Lynn Smith (Ref 296/1), Dr Archie Bethel CBE (Ref 361/1), W R Barr (Ref 470/4), Barbara Fewkes (Ref 705/1), Fergus Muirhead (Ref 780/1), Standard Letter Comment SG2.7A (51 reps) (Ref 1007/1), Standard Letter Comment SG2.7B (16 reps) (Ref 1008/1), Standard Letter Comment SG2.7C (3 reps) (Ref 1009/1)

Remove site SG2.7 from Schedule 11 and Proposals Map and redesignate as Green Belt.

Stewart Milne Homes (Ref 500/11)

Remove site SG2.7 from Schedule 11 and Proposals Map and redesignate as Green Belt.

Site should not be identified in LDP and not form part of M77 SDO

Site Evaluation should be amended - Impact of development from -3 to -6, Access to Service/Facilities from 3 to 0, Effectiveness from -3 to -6, total score from -3 to -12

(g) Policy SG2.8 Barcapel, Newton Mearns

Persimmon Homes and Elphinstone Barcapel Ltd (in administration) (Ref 773/1) (Ref 773/2)

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10 – 175 units.

Removal of site from Green Belt - LDP24A. –Phase 2.

George M Morton (Ref 38/2), Joseph Fell (Ref 87/3), Mr and Mrs William Reid (Ref 95/2), Robert Johnston (Ref 131/1), Norman Gray (Ref 214/2), Robert Russell (Ref 215/1), Sheila Greenshields (Ref 217/1), Norman Graham (Ref 286/12), Martin and Lynn Smith (Ref 296/2), Dr Archie Bethel CBE (Ref 361/2), W R Barr (Ref 470/5), Barbara Fewkes (Ref 705/2), Fergus Muirhead (Ref 780/2), Standard Letter Comment SG2.8A (52 reps) (Ref 1010/1), Standard Letter Comment SG2.8B (18 reps) (Ref 1011/1), Standard Letter Comment SG2.8C (3 reps) (Ref 1012/1)

Remove site SG2.8 from Schedule 11 and Proposals Map and redesignate as Green Belt.

Summary of responses (including reasons) by planning authority:**(a) Policy M2: M77 Strategic Development Opportunity****Support**

Carol A. Gilbert, SPT (Ref 969/1), Scottish Water (Ref 256/10), Education Department ERC (Ref 275/5)

The Council acknowledges and welcomes the support for Policy M2.

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

General**Glasgow City Council (Ref 465/4)**

The Council notes the comments of Glasgow City Council and will continue to consult with Glasgow City regarding master plan preparation and proposals related to the Dams to Darnley Country Park.

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

Objections

George M Morton (Ref 38/4), James Whyteside (Ref 82/10), Janet Mylett (Ref 191/2), Dawn Roberts (Ref 225/1), Ron Burkey (Ref 279/1), Norman Graham (Ref 286/4), Claire Wharton (Ref 419/4), Irene Graham (Ref 448/3), Lynda Murray (Ref 511/3), Keith A Vallance (Ref 536/3), Newton Mearns Community Council (Ref 686/4), Julie Mylett (Ref 704/2), Iain McCowan (Ref 896/4)

As stated in the response to Issue 2.1.2: Development Strategy and Issues 3.3 and 3.4 and through the preparation of the Development Frameworks the Council has demonstrated the effectiveness and deliverability of the master plan areas. These responses address issues concerning loss of green belt, infrastructure (education, roads, transport, drainage), incinerator, potential over development, the Plans compliance with the Approved Strategic Development Plan (SDP) (CD/81), Brownfield development opportunities, business demand, provision of services and facilities and loss of character.

Stewart Milne Homes (Ref 500/1) (500/3), Homes for Scotland (Ref 758/3)

The comments from Homes for Scotland on phasing of sites are addressed under Issue 9.1. In summary it is concluded that a Phasing policy remains appropriate and should be retained.

The overall strategy and justification for these master plan areas and provision of a generous housing supply are addressed under Issue 2.1.2, Issue 9.1, Issue 3.3 and Issue 3.4. Sites at Barrance farm are addressed under Issue 9.2.5.

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

(b) Policy SG6.13 and SG6.22 Netherplace Works, Newton Mearns (Policy M2)

Representations were submitted from James Barr Ltd on behalf of Personal Pension Trust and TPS Planning Ltd on behalf of Whitecraigs Village Ltd. Both proposals support the continued business designation for the site. The representation from Personal Pension Trust Limited objects to the green belt designation of the site.

Support**Personal Pension Trust (Ref 274/1/3)**

The Council acknowledges and welcomes the support for Policy SG6.13 and SG6.22.

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

Objections**Whitecraigs Village Ltd (Ref 502/1) (Ref 502/2), Personal Pension Trust (Ref 274/4)**

This is a large site in the established green belt which is physically separated from the main urban area of Newton Mearns, to which the M77 forms an effective barrier. The site was the location of the former Netherplace Dyeworks most recently occupied by Coates Vyella. Given the requirements of that industry for clean water, it was located for historical reasons in a rural (now Green Belt) location adjacent to a purpose built reservoir. The location is remote from the settlement of Newton Mearns, surrounded by agricultural uses and vehicular access is restricted.

The dye works ceased operation in recent years. Several smaller business and industrial uses are currently operating from the site however a large part of the site and buildings are still vacant.

The site is regarded as a Green belt location protected by Policy D3: Green Belt and Countryside around Towns. The site is also allocated for employment under Policy SG6: Economic Development and falls within Policy M2:M77 Strategic Development Opportunity.

The Council recognises that for historical reasons there are a number of businesses which operate from premises located in the Green Belt. The Council considers that the Plan makes adequate provision for continued business development at this location. Significant intensification of use is unlikely to be viewed favourably however any proposals for new development will be assessed against the above policies and Strategic Policy 2: Assessment of Development Proposals and Policy D1: Detailed Guidance for all Development.

The Proposed Plan aims to provide a flexible approach to promoting sites for employment generating uses rather than being specific. The proposed additional text is therefore not viewed as necessary. The Council is prepared to consider a range of alternative employment generating uses at this site rather than being overly prescriptive. It is acknowledged that redevelopment would remove a large structure and may improve visually the area.

It is recommended that the site should be retained under Policy SG6 which provides the appropriate framework for the site.

The M77 forms a strong and defensible boundary to the green belt in this locality. Consequently, the site should be retained within the green belt.

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

SEPA (Ref 70/38) (Ref 70/42)

In this particular case, it is acknowledged that there may be an issue with respect to flooding. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals. The comments of SEPA will be taken fully into account in the decision-making process.

If the Reporter is so minded to recommend that the Representations from SEPA are accepted and the Plan modified to reflect the need for a Flood Risk Assessment, the Council would be supportive of this modification because it would not have any implications for the wider area or other policies within the LDP.

Schedules 12 and 13

Add F: Flood Risk Assessment Required.

(c) Policy SG10.11 Aurs Road, Newton Mearns**Support****Lynda Murray (Ref 511/11)**

The Council acknowledges and welcomes the support for Policy SG10.11.

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

SEPA (Ref 70/52)

In this particular case, it is acknowledged that there may be an issue with respect to flooding. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals. The comments of SEPA will be taken fully into account in the decision-making process. However, any flood risk issues regarding the realignment of the road could be addressed at planning application stage.

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

(d) Policy SG10.12 Crookfur Road/M77 Newton Mearns**Support****Margaret Gray (Ref 231/3), Andrew Gray (Ref 501/1), Lynda Murray (Ref 511/12)**

The Council acknowledges and welcomes the support for Policy SG10.12

One of the Councils priorities remains to improve connectivity between Barrhead and Newton Mearns through key transport proposals including the 'Balgray Link' Road (SG10.3), upgrades to Aurs Road (SG10.11) and a new railway station at Barrhead South (M2.2 and SG10.4).

This proposal is retained in the Plan to allow for potential longer term enhancement of Junction 4 to provide a 4 way junction. However, the Councils priorities currently centre on delivery of the rail station and upgrading Aurs Road.

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

SEPA (Ref 70/52)

In this particular case, it is acknowledged that there may be an issue with respect to flooding. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals. The comments of SEPA will be taken fully into account in the decision-making process. However, any flood risk issues could be addressed at planning application stage.

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

(e) Policy SG10.3 Balgray Link - Balgraystone Road, Barrhead**Objection**

Iain Donaldson (Ref 252/2), Norman Graham (Ref 286/9), Jane Donaldson (Ref 375/2), Ian Gladstone (Ref 380/4), Lynda Murray (Ref 511/10), Edward Gunn (Ref 651/2), Kate Makrides (Ref 706/2), D Jesner (Ref 783/6), Iain McCowan (Ref 896/11)

Policies M2.1 and M2.2 require the master plan process to investigate the Balgray Link route as part of the sustainable transport strategy for the site. The Balgray Link was not a justification for the release or an essential requirement of the master plan. The infrastructure requirements and development viability consideration of the development framework has identified that the Balgray Link is not required to realise the development of the site and that the cost implications would have been prohibitive to delivering a viable development. Whilst the improvements of connectivity between Barrhead and Newton Mearns remains a Council aspiration and the Balgray Link Route retains the support of the Council it will not be pursued as an integral part of this site. It will remain within the Plan but the Council is seeking to amend the Action Programme to reflect that it will be a long term aspiration, the implementation of which will be sought from alternative funding sources. Development contributions will not be sought towards the cost of this proposal.

This issue is addressed further under Issue 3.3.

In order to provide recognition and clarity of the longer term nature of the Balgray Link Road and if the Reporter is so minded the Council would be supportive of the Action Programme being modified accordingly.

(f) Policy SG2.7 Hillfield, Newton Mearns**Support**

Patterton SPV (Ref 776/1), Mansell Homes (Ref 781/1)

The Council acknowledges and welcomes the support for Policy SG2.7.

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

Objection

George M Morton (Ref 38/1), Joseph Fell (Ref 87/2), Mr and Mrs William Reid (Ref 95/1), Isobel Jane Gallacher (Ref 130/1) Robert Johnston (Ref 131/2), Norman Gray (Ref 214/1), Robert Russell (Ref 215/2), Norman Graham (Ref 286/11), Martin and Lynn Smith (Ref 296/1), Dr Archie Bethel CBE (Ref 361/1), W R Barr (Ref 470/4), Stewart Milne Homes (Ref 500/11), Barbara Fewkes (Ref 705/1), Fergus Muirhead (Ref 780/1), Standard Letter Comment SG2.7A (51reps) (Ref 1007/1), Standard Letter Comment SG2.7B (16 reps) (Ref 1008/1), Standard Letter Comment SG2.7C (3 reps) (Ref 1009/1)

Since publication and subsequent consultation on the Proposed Plan planning consent (2012/0569/TP) (CD/83) was granted December 2013 for 95 houses. The objections received have therefore been superseded by the granting of this consent.

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

(g) Policy SG2.8 Barcapel, Newton Mearns**Support****Persimmon Homes Ltd (Ref 743/2), Persimmon Homes and Elphinstone Barcapel Ltd (in administration) (Ref 773/1)**

The Council acknowledges and welcomes the support for Policy SG2.8.

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

Objection**George M Morton (Ref 38/2), Joseph Fell (Ref 87/3), Mr and Mrs William Reid (Ref 95/2), Robert Johnston (Ref 131/1), Norman Gray (Ref 214/2), Robert Russell (Ref 215/1), Sheila Greenshields (Ref 217/1), Norman Graham (Ref 286/12), Martin and Lynn Smith (Ref 296/2), Dr Archie Bethel CBE (Ref 361/2), W R Barr (Ref 470/5), Barbara Fewkes (Ref 705/2), Persimmon Homes and Elphinstone Barcapel Ltd (in administration) (Ref 773/2), Fergus Muirhead (Ref 780/2), Standard Letter Comment SG2.8A (52 reps) (Ref 1010/1), Standard Letter Comment SG2.8B (18 reps) (Ref 1011/1), Standard Letter Comment SG2.8C (3 reps) (Ref 1012/1)**

Since publication and subsequent consultation on the Proposed and Modified Plans planning consent (2012/0625/TP) was granted on 30th April 2014 for 131 units subject to Section 75 agreement for site SG2.8. The objections received have therefore been partly superseded by the granting of this consent.

A larger site has also been proposed by Persimmon Homes (Ref 773/2) (LDP24A). It is recognised that the submitted supporting information aims to address issues of landscape impact and design.

The Phase 2 proposal for an additional 175 units would result in a significant incursion into the Green Belt. Site SG2.8 is viewed as being more in keeping with the existing settlement form and field boundaries.

The Phase 2 site should continue to be allocated as Green Belt. Other sites have been identified in the Plan to meet housing needs.

As there is no requirement to release additional sites the Phase 2 site has been rejected for inclusion as a housing proposal.

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

Reporter's conclusions:**The underlying principles of Policy M2: M77 Strategic Development Opportunity**

1. Concerns have been expressed about the fundamental intention of Policy M2, particularly in respect of what is perceived as a major green belt release. Such a release is regarded as being contrary to the terms of the Glasgow and Clyde Valley Strategic Development Plan and, indeed, the strategic policies of the local development plan itself.

2. The basis of the development strategy has been examined under Issue 2.1.2 where it is concluded the urban expansion and consolidation approach of the proposed plan

reflects the policy principles set out in Scottish Planning Policy. The two-strand approach to development is contained in Strategic Policy 1. Policy M1 states that appropriate development will be supported in master planned areas as defined on the proposals map. Policies M2.1 and M2.2 lie within the wider area of the “M77 Strategic Development Opportunity” which is shown in the key of Figure 5 as “M2 Master Plan Area”.

3. Policy M2 supports master planned growth “at [in?] the A77 area” in accordance with Policy M1 and Policies M2.1 and M2.2. The M77 area is defined in paragraph 4.3.1 as spanning junctions 4 and 5 of the M77, taking in the urban edges of Barrhead and Newton Mearns and the area of green belt between both settlements.

4. I find the scope of Policy M2: M77 Strategic Development Opportunity, to be difficult to interpret. The emphasis appears to be on master plans to be prepared in accordance with Policy M2.1 and M2.2. However, the relationship between Policy M2 and the area of green belt between Barrhead and Newton Mearns (other than within the land defined under Policy M2.1 and M2.2) is unclear. As explained, support will be given to master planned growth in this area but this would seem to fly in the face of both green belt policy and the “controlled growth” referred to in Strategic Policy 1.

5. Schedule 11 identifies two housing land sites (SG2.7 and SG2.8) within the area of Policy M2. However, these sites are to the north of Newton Mearns, not within the master plan areas, M2.1 and M2.2, and the basis of the designations is not explained. Additionally, Policy SG6.13 and SG6.22, Netherplace Works, apply to land within the wider M2 area.

6. However, subject to some clarification in respect of green belt status, I still consider that Policy M2 is an important component of the strategic vision and objectives of the proposed plan, providing the basis for the identification of the master plan areas at Newton Mearns and Barrhead South.

Policy SG6.13 and SG6.22, Netherplace Works

7. Netherplace Works was originally associated with the textile industry and was sited at this location to secure a source of clean water. Since closing as a dyeworks, a number of other businesses and industries occupy the site although a large part of the premises, known now as “Mearns Park”, remains vacant.

8. I agree with the council that the site should be retained in the green belt. The M77 does indeed act as an obvious and defensible boundary. To designate Netherplace Works as an enclave of non-green belt land would be somewhat incongruous and undermine the wider protective concept of the green belt.

9. Examples of businesses operating from premises within the green belt are inevitable and this is also acknowledged in Scottish Planning Policy. Indeed, Scottish Planning Policy states that an example of development appropriate within a green belt includes the intensification of established uses subject to new development being of a suitable scale and form. This is the approach adopted by the council in designating the site under SG6.13 in Schedule 12, Safeguarded Business and Employment Areas, and SG6.22 in Schedule 13 under Business Proposals. On this basis, I do not support the request to provide scope for a wider range of development potential at this location.

10. The Scottish Environment Protection Agency Flood Map shows the site to be significantly affected by both the 1:200 year Fluvial Event and 1:200 year Surface Water Event. Should this site have been a new development allocation, the proposal would have been questionable. However, under the circumstances, whilst recognising the various policies relating to potential flood issues, I believe the council's suggested inclusion of a note in respect of a flood risk assessment to be appropriate.

Policy SG10.11, Aurs Road

11. I note the Scottish Environment Protection Agency Flood Map indicates a very small part of the site could be subject to a 1:200 year Fluvial Event. I therefore accept the council's assessment that flooding might be an issue, but that the policies in the proposed plan would address any issue in this respect and conclude that there is no requirement for a modification.

Policy SG10.12, Crookfur Road/M77, Newton Mearns

12. I note the Scottish Environment Protection Agency Flood Map indicates a small part of the site could be subject to a 1:200 year Surface Water Event. I therefore accept the council's assessment that flooding might be an issue, but that the policies in the proposed plan would address any issue in this respect and, in turn, conclude that there is no requirement to alter the proposed plan.

Policy SG10.3 Balgray Link – Balgraystone Road, Barrhead

13. I have noted the concerns expressed about the sustainability of the proposed link in terms of traffic levels and related congestion and emissions. No substantive evidence has been provided to support any of these matters. On the other hand the council has explained that the proposed link is a long term aspiration and is not to be pursued as an integral component of the Policy M2.1 and M2.2 master planned areas. The council has suggested a modification to the Action Programme to this effect but I have no remit to make changes to that document.

14. Nevertheless, I note the status afforded to the proposed link by the council. I consider this to be a reasonable approach, particularly as it would be necessary to examine in detail the concerns raised by those making representations should the link be brought forward. In terms of Policy M2.1 and M2.2, the situation should be made clear along with a further note in Schedule 17. Consequential changes to the Action Programme would be a matter for the council. (See also Issue 13 – Sustainable transport network.)

Policy SG2.7, Hillfield, Newton Mearns

15. Despite one submission in support of the proposal, numerous objections were received objecting to this housing land allocation. The site is designated as green belt in the currently adopted local plan. The council has explained that planning permission was granted for 95 houses in 2013. I note that the site is currently under development.

16. This is an example of the dynamic nature of the planning process. In effect, the objections have been superseded and the proposed plan should therefore remain unaltered in this respect.

Policy SG2.8, Barcapel, Newton Mearns

17. As in the previous case, one submission supported the proposal whilst many objections were received. Again the site is allocated as green belt in the currently adopted local plan. The council explains that planning permission was granted for 131 houses in April 2014 although this was subject to the conclusion of a formal planning obligation. However, it is clear that matters have progressed further as a start has been made to the preparation of the site for development.

18. This is a further example of the development process moving forward and again the objections have been superseded. The proposed plan should remain unaltered.

19. Persimmon Homes has also proposed that land under reference LDP24A to the east and south-east of site SG2.8 should be allocated as a further phase of residential development. This land extends beyond the boundary of Policy M2 as shown on the proposals map but nevertheless is conveniently examined as part of this issue.

20. I agree with the council that the extended area would represent a significant incursion into the green belt. In my opinion, even the extension of the allocated area to the east would impinge significantly into the green belt. The eastern edge of the current development represents a clear and reasonable green belt boundary. The land to the south-east, sloping downwards to Barcapel Home Farm, has little visual, physical or topographical relationship with the existing built up area. In any case, the conclusions under Issues 2.1.1, 2.1.2 and 9.1 find that the overall vision and development strategy of the proposed plan is appropriate and that adequate housing land has been provided in line with the requirements set out in the strategic development plan. The proposed plan provides considerably in excess of the strategic development plan requirement for private housing and adequate justification is provided for not meeting the affordable housing requirement. There is no numerical justification to allocate further sites for private housing.

21. Development on any part of the extended site is not justified.

Reporter's recommendations:

I recommend that the following modifications be made:

1. Amend paragraphs 4.3, M77 Master Plan Strategic Development Opportunity, and 4.4, Policy M2: M77 Strategic Development Opportunity as follows (*changes in italics*):

“4.3 M77 Master Plan Strategic Development Opportunity

4.3.1 The focus for urban expansion under controlled growth set out in Strategic Policy 1 is the M77 area. This area spans junctions 4 and 5 of the motorway, including the urban edges of Barrhead and Newton Mearns and the area of green belt between both settlements, much of which is within the Dams to Darnley Country Park. Within this wider area, two urban expansion areas have been identified as identified in Strategic Policy 1. Master plans will be prepared for these two areas as set out under Policies M2.1 and M2.2. The growth proposed in these areas has been informed by:

- The supply of good quality, well-contained development sites that form natural extensions to the urban area. Development sites have been directed to areas of

less environmental quality and sensitivity and will provide long term defensible green belt boundaries;

- Access to the strategic transport options;
- The ability to bring significant environmental, social and economic benefits to both Barrhead and Newton Mearns; and
- The potential to enhance Dams to Darnley Country Park, which is one of the area's most important leisure facilities.

4.3.2 Although the areas adjacent to Barrhead and Newton Mearns are identified as separate master planned areas, they are viewed as complementary and able to provide cross benefits that will assist with the overall delivery of the Plan's Strategy.

4.3.3 *That part of the M77 area not contained within the urban expansion areas will remain as green belt other than for two sites at Hillfield and Barcapel, Newton Mearns which are allocated as part of the housing land supply.*

4.4 Policy M2: M77 Strategic Development Opportunity

4.4.1 The Council will support *the master planned growth of Barrhead and Newton Mearns* as defined on the Proposals Map in accordance with Policy M1 and Policies M2.1 and M2.2. Any future proposals within the master planned areas not specifically identified under these policies will be required to contribute to the overall aims set out in Policies M2.1 and M2.2.

4.4.2 *Land not within the two master planned areas is designated green belt other than two sites at Hillfield and Barcapel, Newton Mearns which are allocated as part of the housing land supply."*

2. Amend Figure 5: Policy M77 Strategic Development Opportunity as follows:

Delete the contents of the key and replace with:

"M2 M77 Strategic Development Opportunity Area
M2.1 Master Plan Area, Newton Mearns
M2.2 Master Plan Area, Barrhead"

3. Amend Figure 4: Key diagram and Proposals Maps as follows:

In the key, delete "M77 Masterplan Area" and replace with "M77 Strategic Development Opportunity Area" and delete "Other Masterplan Areas" and replace with "Master Plan Areas".

4. In Schedules 12 and 13, SG6.13 and SG6.22 respectively, after Netherplace Works, Newton Mearns, insert "*".

5. At the foot of schedules 12 and 13 insert "* Development proposals will require to be subject to a flood risk assessment."

6. In paragraphs 4.5.4 and 4.6.4, in Policies M2.1 and M2.2 respectively, change the third bullet points as follows:

"Investigate improvements to connectivity between Barrhead and Newton Mearns

including, in the long term, the 'Balgray Link' route."

7. In Schedule 17, Sustainable Transport, under SG10.3, change the description to:

"Investigate improvements to connectivity between Barrhead and Newton Mearns (long term) (Policy M2.1 and M2.2)"

<p>Issue 3.3</p>	<p>MASTER PLAN MALLETSHEUGH/MAIDENHILL NEWTON MEARNS</p>	
<p>Development plan reference:</p>	<p>Policy M2.1: M77 Strategic Development Opportunity Malletsheugh/Maidenhill Newton Mearns Schedule 11 – Distribution, Capacity and Phasing of Additions to the Housing land Supply – Master Planned Sites</p>	<p>Reporter: Richard Dent</p>
<p>Body or person(s) submitting a representation raising the issue (including reference number):</p>		
<p>John Pollock (Ref 61/1) SEPA (Ref 70/13) (Ref 70/25) (Ref 70/26) (Ref 70/27) Scottish Natural Heritage (Ref 88/2) Kathryn Sanderson (Ref 235/2) Iain Donaldson (Ref 252/3) Co-operative Group (Ref 254/1) Scottish Water (Ref 256/2) Jane Donaldson (Ref 375/3) Cala Homes and Taylor Wimpey (Ref 378/1) (Ref 378/5) Stewart Milne Homes (Ref 500/10) Sport Scotland (Ref 702/4) Mactaggart and Mickel Homes Limited (Ref 703/1) Persimmon Homes Ltd (Ref 743/8) Nazir Ahmed (Ref 755/2) Scottish Natural Heritage (Ref 964/3) Mathieson Melrose (Ref 971/1)</p> <p><u>Appendix 1 - Common Objections List of Representees and Standard Letters</u></p> <p>Policy M2.1: M77 Strategic Development Opportunity - Malletsheugh/Maidenhill Newton Mearns - Common Objections List of Representees (279reps) Standard Letter Comment M2.1A (223 reps) (Ref 995/1) Standard Letter Comment M2.1.B (9 reps) (Ref 996/1)</p>		
<p>Provision of the development plan to which the issue relates:</p>	<p>Chapter 4: Key Areas for Change and Settlement Strategies Para. 4.5 – 4.5.4 – Policy M2.1 M77 Strategic Development Opportunity Malletsheugh/Maidenhill Newton Mearns Figure 6: Policy M2.1 M77 Strategic Development Opportunity Malletsheugh/Maidenhill Newton Mearns Policy SG2.9 Malletsheugh (East), Newton Mearns & Policy SG2.10 Malletsheugh (West), Newton Mearns Policy SG2.11 Maidenhill Newton Mearns Policy D13.19 Maidenhill, Malletsheugh, Newton Mearns, Expansion Area Policy D13.20 Maidenhill, Malletsheugh, Newton Mearns, Expansion Area Strategic Environmental Assessment Site Evaluation</p>	

Planning authority's summary of the representation(s):**(A) Policy M2.1: M77 Strategic Development Opportunity - Malletsheugh/Maidenhill Newton Mearns****Support**

Scottish Water (Ref 256/2) - Support and will work closely with Local Authority and participate in the master plan process.

Cala Homes and Taylor Wimpey (Ref 378/1)

Recognises the appropriateness of site for residential development and delivery of the aims of the LDP

Site meets effectiveness tests

Master plan has been prepared (submitted with rep)

Master plan submitted includes Maidenhill Farm - extending M2.1 boundary, increasing site capacity, flexibility and potential for site to accommodate more than 800 units

Will seek to develop mixed types and tenures of housing and delivery of live/work units

Would support land at Malletsheugh Inn for development of employment/ community/ retail/religious facilities due to central location and road frontage

Seek to work with council on provision of 2 primary schools and under 5s provision, have allocated area in master plan

Council could adopt higher growth strategy/ site could accommodate more units with inclusion of Maidenhill Farm

Summary of Common Objections

(Full list of representees set out in Appendix 1 and objections set out in Appendix 2. Summarised key points are set out below. Due to the volume and level of detail expressed in representations points have been summarised under a number of sub headings as shown below)

(1) Development Strategy and Housing land Supply

- Object to proposal to build 1000 houses
- Objects to plans for a retail gateway
- Against policies in SDP - SDP does not call for major Green Belt release
- Housing need unproven
- 36 years worth of land supply in Glasgow and Clyde Valley on Brownfield sites
- Plenty of Brownfield sites in East Renfrewshire suitable for use.
- Green Field development at the expense of innercity Brownfield rejuvenation.
- Could cause depopulation in Glasgow creating further inequalities
- LDP provides 3200 private houses more than SDP requirements
- Barrhead and others council areas require economic regeneration and housing should be prioritised in these areas to stimulate growth
- Brownfield sites LDP 53, 54, 80, 82, 83, 84 available.
- M2.1 should be redistributed over smaller more manageable sites to such areas
- Building affordable housing in this area is a contradiction and decreases desirability of area with high cost housing.
- Newton Mearns not suitable for sustainable development as travel (car etc) required to access facilities and work.
- Newton Mearns reached critical mass on housing development

- Unwarranted as population projections do not anticipate anything like this population growth the LPD caters for (figures 3.25% by 2023, 5.2% by 2033 Registrars General)
- Housing unnecessary given Newton Mearn's ageing population
- No attempt at justified scale, mix and location of proposal
- There will be insufficient demand causing house prices to drop
- Existing planning permissions in Newton Mearns for many houses in better locations yet to be built showing lack of demand
- Sites near Patterton train station should be examined
- Urban infill in Newton Mearns should be prioritised

(2) Site Evaluation

- Site Evaluation overall score should be -9 and retained as Green Belt
- Scoring changed in favour of these sites.

(3) Infrastructure

Education

- Effect on school provision both primary and secondary - Primary school is full to capacity.
- Where is evidence to prove need for secondary school provision can be absorbed.
- Will extensions to the school be funded by tax payers as developer contributions not sufficient
- Oversubscribed school reducing chance of reaching potential and good results
- May have to attend school in another area due to lack of places

Roads and Transportation

- Assessment should be made available from Strategic Traffic Model
- Traffic congestion from cars in new development.
- Extra transport will cause pollution.
- Road infrastructure already quite congested with increased traffic off M77
- M77 not built for 'ribbon development'
- What additional transport link would be provided? currently poor bus service
- No rail stations in walkable distance so require transport/carbon emissions
- Upgrading Aurs Road so traffic can travel faster through country park bad idea
- SG10.3 Balgray link would make traffic worse, will increase congestion and emissions,
- improvements to Aurs Road better
- No access to mass transit system
- Exacerbates traffic on Junction 5 M77
- Not clear where sites will be connected to road network
- Transport Scotland need to make comment and have not funded J4 M77 improvements
- Comments required from all transport providers
- Road Safety concerns.
- No Green Belt boundary as proved by motorway services permission

Health

- Lack of Medical care provision.
- Impact upon existing GP Services.

Development Contributions

- Impact on existing Newton Mearns infrastructure without adequate provision of additional infrastructure.
- Who will support infrastructure - developer contribution insufficient
- There is no investment/developer appetite or finance available for anything of such scale in the immediate first 5 years of the plan
- No increase in young people's places - community halls, clubs and youth groups
- Dams to Darnley Park has access issues and will not be of sufficient quality to be a 'country park'

Drainage and Flooding Issues

- Drainage, water and sewerage issues.
- Flood risk issues.
- Urban run-off poses a risk of flooding lower down as Ayr Road and Cheviot Drive already suffers. Costly flood prevention schemes
- Site SG2.11 – increased run off to Shawlinn Burn.
- Maidenhill requires full Hydrological modelling and maintenance
- Southern most aspect of Newton Mearns colder than other areas resulting in unsustainable U values
- Housing and businesses should be directed away from this area (directed to lower altitudes in preference to higher altitudes)
- SUDs scheme drained through unadopted private watercourses
- Comments required from all utility providers on viability and cost of servicing proposals

(5) Environmental Issues

- Destroys wildlife habitat and leads to displacement
- Loss of parkland and access to the countryside if Green Belt is built on.
- Nowhere to grow food if Green Belt built on
- Peat at Maidenhill
- Proposals will result in a increase in carbon emissions as location means people will rely on car – poor public transport options.
- Increase in traffic will mean more pollution.
- Detrimental visual impact on the approach to Glasgow
- Coalescence
- EIA made available to the public
- Fail to provide strong defensible Green Belt boundary, will make surrounding land amenity drastically reduced, will encourage development in these areas

(6) Loss of Character Amenity

- Loss of amenity to local community
- Will permanently change character of the area
- New houses poor - close together/small gardens

(7) Economic and Retail Development

- Not clear where high tech businesses will be sited
- Businesses do not wish to locate in this area
- Business sites at Greenlaw unsustainable here will not do better
- There is no reasoned justification for the scale of business employment land releases

- SDP directs economic development elsewhere
- New shopping facilities would be an improvement
- No access to leisure facilities would require car.

(8) Other

- M2.1 masterplan will have no input from local residents
- Reduction in property values
- Proposal gives more weight to Incinerator as a means of power supply.
- Provision in policy are list with no indication of what happens if not met (assumed development would not go ahead but this is not stated)
- No explicit policy provision that would prevent release or partial release without full infrastructure or developer contributions.

Other Objections

Scottish Natural Heritage (Ref 88/2) - Reference within Policy M2.1 and M2.2 to “Upgrades to Aurs Road, Barrhead to Crookfur Road/M77 link road” should be removed as this was the wording used to describe the now abandoned Barrhead/M77 link road through the middle of the Country Park which appears in the currently adopted Local Plan.

Co-operative Group (Ref 254/1) - Objection to lack of detail on retail

Sport Scotland (Ref 702/4) - Concerned about impact on available recreation. Urge council to assess and mitigate against impacts on outdoor sport and recreation interests.

Persimmon Homes Ltd (Ref 743/8) - The Council have allocated units post 2025 the programming which has been attributed to these areas up to 2020 is unrealistically high and unlikely to deliver the numbers which they are anticipating. Clouds the overall five year effective land supply figure and will create a further shortfall. The Council may wish to reassess the requirement to provide indicative programming in order to encourage development to be considered wholly prior to indicatively phasing delivery. This also enables smaller sites, without the requirement for a masterplanning exercise to come forward in the interim and deliver units within the plan period, something which Masterplan sites are unlikely to achieve.

(B) Policy SG2.9 Malletsheugh (East), Newton Mearns & Policy SG2.10 Malletsheugh (West), Newton Mearns

Support

Pollock (Ref 61/1) - Support inclusion of land at Malletsheugh Farm site SG2.10 as part of SDO Policy M2.1.

Agree with Council's approach to early consultation which should form the basis for detailed masterplanning.

Committed to joint working with other land holders/developers.

Agree to general terms of masterplanning subject to further information being supplied by the Council and subject to further planning gain information.

Site is effective in accordance with PAN2/2010

Site attractively set with defensible boundaries

Suitably located to link with existing facilities

Site can be integrated

Objections**Mactaggart and Mickel Homes Limited (Ref 703/1) -**

Specifically sites SG2.9 and SG2.10

Question linkage to larger site SG2.11 and M2.1 generally

M2.1 does not allow for site to be delivered in short to medium term

Sites SG2.9/10 are obvious first phase of development but current wording does not provide necessary flexibility

Sites could stand alone on its own merits, representing a logical rounding off of Newton Mearns

Would work with SPG and other sites in M2.1 for developer contributions

School need not be located within the masterplan area

SEPA (Ref 70/25) (Ref 70/26) - Assessment of flood risk required.

(C) Policy SG2.11 Maidenhill Newton Mearns**Objection****Cala Homes and Taylor Wimpey (Ref 378/5)**

Increase figures as Malletsheugh being promoted for non-residential elements allowing provision of residential elsewhere

Accept need to deliver public transport upgrades but question upgrades to Aurs Road, Barrhead to Crookfur Road/M77 link road and Balgray Link

Unclear on enhancements to Dams to Darnley Country Park and why this is relative to this site

Want all non residential elements to be justified and viable

Firmly of the view the whole site can deliver more than 450 units between LDP adoption 2014/2015, land in current local plan not sufficient to maintain 5 year land supply

SEPA (Ref 70/27) - Assessment of flood risk required.

Stewart Milne Homes (Ref 500/10) - Sites 12A/B Maidenhill are identified as requiring conservation in the Green Belt Landscape Character Assessment

Identified as having moderate to strong Green Belt value, medium landscape value and conservation and protection

Small scale development may be appropriate to define edge

Site would require at least 2 access points - it is considered the existing site frontage is insufficient to accommodate this

Inconsistent with access on M77 Masterplan Corridor Study

No foul drainage sewers in vicinity of site

Significant infrastructure upgrades and access limitations (which reduce effective capacity) - site would be ineffective due to significant financial investment required (as recognised in effectiveness scoring in Site Evaluation)

(D) Policy SG1: Housing Supply - Garden Centre Malletsheugh**Support**

Mathieson Melrose (Ref 971/1) - Promotion of site

Planning application exists for a Garden Centre development (Ref: 2011/0765/TP)

Mixed use development

(E) Policy D13.19 Maidenhill, Malletsheugh, Newton Mearns, Expansion Area**Support**

Nazir Ahmed (Ref 755/2) - Support allocation of a site for a Muslim religious facility in the Maidenhill, Malletsheugh, Newton Mearns Expansion Area (D13.19). We would be looking for, depending on costs, a 1-2 acre (preferably corner) plot in the relevant LDP, conveniently located for access (to and) from the closest major main road and residential community facilities.

Objections

Kathryn Sanderson (Ref 235/2) - Clarification required on religious facility.

Iain Donaldson (Ref 252/3), Jane Donaldson (Ref 375/3)

Strongly object to Muslim facility as there is not a large Muslim population and will not serve the majority of the population. People in Newton Mearns do not have a community centre as it is and should be open to all

Being available just to the Muslim community infringes on human rights
Already facilities in South side of Glasgow why is a third needed?

(F) Policy D13.20 Maidenhill, Malletsheugh, Newton Mearns, Expansion Area**Objection**

SEPA (Ref 70/13) - Assessment of flood risk required.

(G) Strategic Environmental Assessment**Objection**

Scottish Natural Heritage (Ref 964/3) - The assessment of the overall Master Plan sub-area M2.1 concludes that it will in fact have beneficial impacts in terms of Environmental Objective 1 - protecting, enhancing and restoring biodiversity. SNH would query this.

Neutral impacts in terms of this Objective are certainly possible, but only if the first sentence in the commentary box on this assessment succeeds – i.e. that master planning can ensure no negative impacts on the Local Biodiversity Site (LBS) which lies at the heart of the area. Furthermore, the assessment of the biodiversity impacts of the specific housing allocation that includes this LBS (allocation SG2.11) have accordingly been assessed as negative, while all other housing allocations making up the M2.1 Master Plan area have been assessed as having neutral impacts. How the Masterplan of itself can ensure that there will be an overall positive biodiversity impact in this area is not clear. We would therefore suggest that such impacts would be more likely to be neutral overall.

SNH would agree with the assessment of The Balgray Link road presented here. We note that the impacts of the proposal in terms of Environmental Objective 15 – Protect, enhance and create green spaces important for recreation and biodiversity - are considered to be negative, and this is indeed likely to be the case given the proposed creation of new road infrastructure through green belt land. However as this transport proposal should meet an established need while avoiding the requirement for a new

Barrhead to M77 motorway link built through the centre of the Dams to Darnley Country Park (as proposed in the current adopted Local Plan), this is certainly SNH's preferred option in terms of environmental impacts.

Modifications sought by those submitting representations:

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

Appendix 3 provides Common Objections List of Representees Modifications

Remove site M2.1 from Schedule 12 and Proposals Map and redesignate as Green Belt.

No justification for Strategy.

Housing numbers should be reduced further.

Business and Economic Proposals should be removed.

Balgray Link should be removed.

Policy will result in negative impacts upon infrastructure (roads, schools, drainage, health), the environment, amenity, flooding, pollution and will not deliver social or economic benefits.

Strategy should focus on delivery of Brownfield sites only - Huge areas of Brownfield in Glasgow that should be redeveloped first.

Brownfield sites available for housing LDP 53, 54, 80, 82,83, 84.

Incinerator proposals should be removed and not supported.

Proposals to deliver affordable housing should be removed.

Development Contributions Policy must ensure developers pay for all necessary infrastructure.

Further consultation on master plan required.

Housing and businesses should be directed away from this area (directed to lower altitudes in preference to higher altitudes)

Site Evaluation scoring should be revisited and sites scored less favourably.

Scottish Natural Heritage (Ref 88/2) - Alternative wording required to describe the currently proposed Balgray Link to prevent confusion.

Co-operative Group (Ref 254/1) - Need to define size/threshold of retail floor space to ensure it is at neighbourhood scale.

James Scrimger (Ref 278/2), Janice Scrimger (Ref 284/2)

Policy M2.1 should be abandoned and resources directed to more suitable development sites. Only well distributed smaller scale developments should be retained within LDP for Newton Mearns where it can be demonstrated they meet the changing needs of existing local communities.

Remaining proposals for Newton Mearns should not progress until above issues researched and transparently disclosed.

Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/3) - Policy should be reworded to prevent release or partial release without full infrastructure or developer contributions.

Stewart Milne Homes (Ref 500/4) - Remove site M2.1 from Schedule 12 and Proposals Map and redesignate as Green Belt.

Alternative Green Belt residential release sites exist.

Balragy Link should be removed.

Newton Mearns Community Council (Ref 686/3) - Development in Newton Mearns should be infill, adjacent to rail network and provide school places within existing catchment areas.

Sport Scotland (Ref 702/4) - Proposal should mitigate against impacts on outdoor sport and recreation interests.

Persimmon Homes Ltd (Ref 743/8) - The indicative capacity of housing units proposed as part of the 'Strategic Development Opportunity' sites should not prejudice 'oven-ready' housing sites coming forward by allocating too many units associated with the Masterplan developments within the plan period, which are unlikely to be delivered.

(B) Policy SG2.9 Malletsheugh (East), Newton Mearns & Policy SG2.10 Malletsheugh (West), Newton Mearns

Mactaggart and Mickel Homes Limited (Ref 703/1)

Policy should to allow for site to be delivered as Phase 1 in short term.

4.5.2. delete words 'adoption of' and insert 'approval of development framework for'

4.5.4. add, in brackets, 'Note: an alternative opportunity site for the denominational primary school is being investigated at Waterfoot Road Newton Mearns. In the event that this proves feasible a facility at this location would fulfill the requirement for a denominational primary school at this location.'

SEPA (Ref 70/25)(Ref 70/26) - Flood risk assessment required.

(C) Policy SG2.11 Maidenhill Newton Mearns

Cala Homes and Taylor Wimpey (Ref 378/5)

Extend to include Maidenhill Farm within boundary

Request flexibility in numbers and phasing

Long term development should be post 2025 only rather than 'safeguarded'

SEPA (Ref 70/27) - Flood risk assessment required.

Stewart Milne Homes (Ref 500/10)

Site should not be identified in LDP and not form part of M77 SDO

Site Evaluation should be amended - Impact of development from -3 to -6, total score from -2 to -5

(E) Policy D13.19 Maidenhill, Malletsheugh, Newton Mearns, Expansion Area

Kathryn Sanderson (Ref 235/2), Iain Donaldson (Ref 252/3), Jane Donaldson (Ref 375/3) - Remove proposal from Plan.

(F) Policy D13.20 Maidenhill, Malletsheugh, Newton Mearns, Expansion Area

SEPA (Ref 70/13) - Flood risk assessment required.

(G) Strategic Environmental Assessment

Scottish Natural Heritage (Ref 964/3) - Alternative wording required to describe the currently proposed Balgray Link to prevent confusion.

Summary of responses (including reasons) by planning authority:**(A) Policy M2.1 M77 Strategic Development Opportunity****Appendix 4 provides Common Objections List of Representees****Other individual responses are also included in the followings sections****Overview**

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council's approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

Policy M2.1 is critical to the delivery of the Council's long term vision and development strategy for East Renfrewshire. To ensure the development is carried out in a manner that delivers the Council's vision and delivers development in a sustainable way, the Plan makes it clear that the site will be master planned. The first stage of this process is the preparation of a Development Framework (CD/21). This document was approved by East Renfrewshire Council at its meeting of 29th January 2014.

The master plan will be adopted by the Council as Supplementary Planning Guidance. Justification for the master plan process is set out further under Issue 3.1.

Due to the volume and level of detail expressed in representations points have been addressed under sub sections 1-8 below.

1) Development Strategy and Housing land Supply**Support****Scottish Water (Ref 256/2), Cala Homes and Taylor Wimpey (Ref 378/1)**

The Council acknowledges and welcomes the support for Policy M2.1.

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

Objections

Issues raised concerning compliance with the SDP, the SDP housing requirements and the Strategic Housing Need and Demand Assessment (SHNDA) (CD/82), impact upon the regeneration of Glasgow, calculation of housing targets for the Plan, supply of Brownfield sites, justification for site selection, loss of Green belt and housing choice and mix are all fully addressed under Issues 2.1.2: Development Strategy and 9.1: Housing Supply

It is clearly shown that the Plan is providing a generous land supply and providing a range and choice of locations across the Eastwood and Lavern Valley Housing Market Areas on both Brownfield and Greenfield sites as demonstrated in the Monitoring Statement and the 2013 Housing Land Audit update (CD/54 and CD/55). The Plan is fully in compliance

with the requirements of SDP and SPP. The SDP clearly shows a need for new housing development in East Renfrewshire. It is also clearly shown that the Development strategy will deliver positive social, economic and environmental benefits for the area.

There is a clear need for affordable housing in the Eastwood housing market area particularly for social rented housing. The Development Framework therefore requires developers to provide 25% affordable housing of which 20% of the total is required to be for social rented units. The approach to Affordable Housing is addressed further under Issue 10: Affordable Housing and Housing Mix.

The Site Evaluation (CD/09), SEA (CD/06) and the Green belt review have been key considerations in the identification of preferred sites for the Plan. This master plan area is contained within clearly defensible boundaries provided by the M77 Trunk Road and the Glasgow Southern Orbital route. These major roads form a strong boundary that will clearly define the new urban edge. This release has been undertaken to ensure properly planned and controlled urban growth. Development will not encourage ribbon development along the trunk road network.

A number of alternate proposals, the majority of which fall within the Green belt, have been promoted through the consultation and these are addressed under Issues 3.2, 3.10 and 9.2-9.7. It is not recommended that additional sites are required for inclusion in the Plan.

The population and household projections set out in the SDP as reflected in the SHNDA are used in setting housing targets for the Plan. These projections are based upon an optimistic recovery of the region's economy and a quicker return to past growth rates and assumes a positive net migration. Appendix H1 Table H1.5 of the Monitoring Statement outlines population and household projections to 2025. Population and house hold data is also set out in the Councils Planning for the Future Document (CD/59).

It is acknowledged that East Renfrewshire has an ageing population and the Plan acknowledges the impact this will have on the type of housing and facilities that will require to be provided in future years. Policy SG4: Housing Mix in New Developments and SG5: Affordable Housing particularly responds to this issue. The Council also has growing numbers of families whose needs are also covered by the Policy.

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

Persimmon Homes (Ref 743/8)

The Council cannot dictate build out rates or how the market may change over the period of the plan but this will be kept under review through the annual Housing Land Audit and Monitoring Statement. This will ensure there remains a 5 year effective supply as required by SPP. The Council maintains that Policy SG3: Phasing of New Housing Development and the plans strategy are in accordance with SPP and that a phasing policy remains a key component of the Plan. This is addressed further under Issue 9.1.

The Council has released strategic development sites to ensure development in East Renfrewshire is delivered in an appropriate and planned manner. The effectiveness of the site including its ability to deliver the housing numbers and the developers' interest in doing so has been established by the development framework. A detailed phasing Plan will be prepared for the SPG in due course.

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

2) Site Evaluation**Objections**

Issue 2.2: Strategic Policy 2 Assessment of Development Proposals addresses matters raised with the site evaluation and sequential approach. The methodology was revised following the MIR consultation (CD/03) to address accessibility issues raised by SPT (CD/10). In addition any new information was factored into the new assessment. This issue concludes that the sequential approach has been clearly followed in the site selection process.

The site evaluation along with the SEA together provides a consistent, robust and objective framework for the assessment of land use proposals. The Council is satisfied the scoring has been undertaken in a rational, fair and transparent manner.

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

3) Infrastructure:**a) Education****Objections**

The Plan recognises concern over the provision of education and has identified the need for the onsite provision of 2 new Primary schools with associated pre-5 provision. The need for these schools has been assessed by the Council's Education Department and they have further advised that Secondary capacity can be managed within the existing school estate, subject to appropriate development contributions. This is confirmed by the Education Department's response to the LDP. A modification to the Proposed Plan proposes that the denominational Primary School is delivered in an off-site location but on a site that is in a preferred educational location at Waterfoot Road, Newton Mearns. Discussions are ongoing over the acquisition of that site to target delivery of the school by the start of school term 2017. The Council has allocated the required capital cost within the capital plan. This will meet the required denominational education requirements. This issue is discussed further under Issue 7 (D13.28) which concludes that the site be retained in the Plan as suitable for a new school.

The second (non-denominational) Primary will be required by the start of the 2019 school term. Discussions with developers are continuing to acquire a site within the Maidenhill area of the master plan. This will form a community focus for the master plan area. The second primary will be funded partly through development contributions. The Council will be required to part fund this school and has agreed the allocation of the required level of funding within the Council's capital Plan.

Primary and pre-5 provision will be provided within these new schools. The contributions for Education are based on the Council's adopted Supplementary Planning Guidance on Development Contributions 2012 (CD/25) which was developed in consultation with the Council's Education Service.

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

b) Roads and Transportation**Objections**

Whilst the Council accepts that the residential and other uses proposed will inevitably result in increased pressure on local roads, there has been no hard evidence submitted to the Council by respondents that quantify this and no evidence that the effects cannot be mitigated in an acceptable manner.

It should be noted that a strategic movement strategy (CD/48) has been undertaken and this is incorporated within the Development Framework. This provides a high level strategic assessment and has formed the basis for a full Transport Assessment to be undertaken. This examined the impact on the Trunk road network, on local road junctions and identified any work required to improve these. The offsite junction improvements identified in the Transport Assessment (TA) (CD/47) will have to be funded through development contributions. The Council has advised developers that these junction improvements will be required upon commencement of construction. The Council has also engaged with Transport Scotland and Strathclyde Partnership for Transport (SPT). Their views and requirements were reflected in the scope of the Transport Assessment. There have been no adverse comments raised by Transport Scotland or SPT to this land release.

The Development Framework places strong emphasis on measures to decrease the use of private cars, the encouragement of public transport networks and a strong green network incorporating cycle and pedestrian routes to positively tackle climate change issues. There has been active partnership working with Scottish Natural Heritage (SNH) and Glasgow and Clyde Valley Green Network Partnership to ensure these principles are firmly embedded within the Framework.

Access to each of the development sites has been determined through the Transport Assessment and will be confirmed at detailed planning application stage. The TA has identified that each land parcel can be accessed individually without being dependent upon another landowner. The Glasgow South Orbital (GSO) is not the responsibility of Transport Scotland and any access to be taken from there will require agreement from the Council and would be funded by the developer as a development requirement. Improvements to Junction4 of M77 remains as a proposal within the Plan but is cited in the Action Programme as a longer term aspiration of the Council.

Policy M2.1 required the master plan process to investigate the Balgray Link route as part of the sustainable transport strategy for the site. The Balgray Link was not a justification for the release or an essential requirement of the master plan. The infrastructure requirements and development viability consideration of the development framework has identified that the Balgray Link is not required to realise the development of the site and that the cost implications would have been prohibitive to delivering a viable development. Whilst the improvements of connectivity between Barrhead and Newton Mearns remains a Council aspiration and the Balgray Link Route retains the support of the Council it will not be pursued as an integral part of this site. It will remain within the Plan but the Council is seeking to amend the Action Programme to reflect that it will be a long term aspiration, the implementation of which will be sought from alternative funding sources. Development contributions will not be sought towards the cost of this proposal.

It is acknowledged that public transport is currently available along Ayr Road but not yet further into the site due to its current green field undeveloped status. In addition it is

acknowledged the site is not within close proximity of a railway station. Following discussions with SPT there will be a requirement for a bus service, potentially subsidised, for a 3 year period after the 100th house completion and this will be funded through Development Contributions. This will provide a route to be agreed with SPT but should provide a circular route through the site with links to Ayr Road and Patterton Station park and ride facilities where excess capacity exists. A search area for Park and ride alongside the M77 is also being investigated with the opportunity for an express bus service into Glasgow City and Ayr. This was explored further within the Transport Assessment and will remain an option to be fully investigated as part of the master plan exercise.

The consent for a Motorway Service Area has now lapsed. The Council is satisfied that the GSO is a very clear defensible edge to the urban area. If the site was considered suitable for park and ride facilities, this would be carefully considered and assessed both through the master plan and development management process.

In order to provide recognition and clarity of the longer term nature of the Balgray Link Road and if the Reporter is so minded the Council would be supportive of the Action Programme being modified accordingly.

Scottish Natural Heritage (Ref 88/2)

The council remains supportive of the opportunity to upgrades at Aurs Road. However, it is agreed that references to the former link road through the country park be removed. This was an earlier drafting error.

In order to correct this error and provide clarity if the Reporter was so minded the Council would be supportive of the proposed modification as follows:

Policy M2.2 Para 4.6.4 third bullet

Provision for a sustainable transport strategy comprising:

- Public Transport Upgrades;
- Provision of a new rail station at Springfield is investigated and land safeguarded;
- Upgrades to Aurs Road, ~~Barnhaed to Crookfur Road/M77 link road~~;

c) Health

Objections

The Council has consulted Greater Glasgow Health Board and no concerns were raised in this respect. A new health centre is being constructed in Drumby Crescent, Clarkston and it is expected that this will provide services to a wide catchment population. If capacity or need issues arise Strategic Policy 2: Assessment of Development Proposals and Policy D13: Community, Leisure and Educational Facilities provide the appropriate framework for considering future opportunities.

In addition the Development framework provides opportunities for improved green networks, sports and leisure facilities (702/4Sport Scotland) and pedestrian and cycle routes to promote healthy living and well being. Promoting healthier lifestyles is a key component of the Plan as identified under the Social Theme (Table 2 of the Proposed Plan refers).

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

d) Development Contributions**Objections**

A number of representations state a failure of the Council to deliver the required infrastructure and services to support previous developments and query how these will be delivered to accommodate new proposed developments. These matters have been demonstrated under Issues 2.1.2: Development Strategy and Issue 2.3: Development Contributions. It is viewed that the Action Programme and the SPG on Development Contributions (2012) (CD/25) will be key in clarifying the development requirements. No significant issues have been raised by any of the infrastructure and service providers.

The Council has been working closely with internal departments, Key Agencies and the development industry to identify development contributions required in line with Scottish Government Circular 3/2012 (CD/74) and with the Council's adopted SPG on Development Contributions. This is to ensure that infrastructure requirements can be delivered in line with phasing of units, that the site is effective in terms of delivering the housing units in line with the Plans expectations and that the existing communities are not adversely affected by the development.

The development contributions required from this development will be fully assessed and will be collected on a phased basis as the housing units are developed out. The contributions will be in addition to all the design and place making requirements set out in the Development Framework and in addition to the delivery of 25% on site affordable housing in line with Council policy.

The development contributions have been assessed to take viability into consideration and have been broadly agreed by the developers. Viability will remain essential for delivery and will be tested by the Council in conjunction with the District Valuers Service if required.

This process will assist with the delivery of 2 new primary schools, appropriate community and sports facilities (702/4Sport Scotland), sustainable transport solutions and a contribution to Dams to Darnley Country Park, a major local leisure facility. The loss of Green belt/open space will be mitigated by ensuring a strong green network throughout the site, together with good footpath and cyclepath links and improvements to Dams to Darnley Country Park. The Council recognises that it will not be possible to deliver all essential infrastructure through development contributions and some infrastructure will required to be delivered through other funding sources including from public sources. Development contributions will be confirmed through the master plan process as stated in policy M2.1. Development Contributions are further addressed under Issue 2.3.

A stated priority in the Plan is the need to enhance Dams to Darnley Country Park (Ref 378/5). This is a key Council priority. It will provide an enhanced facility for both existing residents and for the residents of Malletsheugh/Maidenhill and Barrhead South master plan areas. The opportunity exists to create new community facilities and improvements to this green space resource.

Issues raised stating that the proposals are only promoted to allow for planning gain for the Council or for political motivation are totally refuted. The Council are required to meet and comply with the requirements of SPP and the SDP, including housing need and demand requirements. Development Contributions are a recognised component of the planning process.

Ian Kelly, Graham and Sibbald on behalf of Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/3) stated that there is no investment/developer appetite or finance available for the proposal in the immediate first 5 years of the plan. Representations received to the Proposed Plan confirm a very strong interest in supporting this site and a desire to proceed with development at an early date. The Council has also allocated capital funding towards the cost of the denominational primary school to be delivered by 2017 and to the non-denominational Primary required by 2019. Affordable housing funding will be used to deliver affordable units. Other funding sources will also continue to be pursued.

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

4) Drainage and Flooding Issues

Objections

SEPA (Ref 70/13, 70/25, 70/26, 70/27)

Many respondents have raised concerns about flooding and the drainage capacity of the site and the need to use private water courses to effectively drain the site.

The site is not located within the SEPA functional flood plain, however the requirement for assessment of flood risk is recognised and accepted. The Council confirms that a full flood risk assessment will be required across the master plan area prior to development proceeding and this is made clear within the Development Framework. This assessment will be carried out to inform the preparation of the master plan. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals

The Council commissioned a hydrological study (CD/46) to inform on surface water drainage. Developers have undertaken flood risk assessments and initial drainage impact assessments and these demonstrate that the site can be satisfactorily drained, achieving zero impact in terms of increases in flood volumes, combined sewer overflow spill frequencies and flood volumes. Surface water drainage will be achieved utilising Sustainable Urban Drainage systems (SUDs).

A notional development solution together with associated development costs has been completed and this includes a proposed development pumping station and construction of downstream sewer reinforcements.

Scottish Water have also made it clear that they are funded to provide upgrades at treatment works where 5 growth criteria have been met and that lack of capacity should not be seen as a barrier to development.

On the information supplied by developers, there will be no use made of private watercourses.

If the Reporter is so minded to recommend that the Representations from SEPA are accepted and the Plan modified to reflect the need for a Flood Risk Assessment for the master plan, the Council would be supportive of this modification because it would not have any implications for the wider area or other policies within the LDP.

Policy M2.1

Add F: Flood Risk Assessment Required.

5) Environmental Issues**a) Effect on environment, landscape ecology and wildlife****Objections**

The development framework has been developed in close consultation with SNH and Glasgow and Clyde Valley Green Network Partnership (GCVGNP), who have supported the Council in ensuring that a strong emphasis is placed on visual landscape assessment and integration of a strong green network. While it is accepted that development will inevitably have an impact, the Council will ensure both through the master plan process and through subsequent planning applications, that any adverse impact is minimised and appropriately mitigated, such as landscape buffer strips together with recommended planting schemes incorporating appropriate native species. The site is currently not of high ecological or wildlife value. The master plan will be screened for Environmental Impact Assessment (EIA) and applicants will have to comply with the EIA regulations. The Development Framework sets out a clear requirement to ensure minimisation of adverse impact and that appropriate mitigation measures will be in place.

Landscape and green belt impact, environmental quality and visual sensitivity were key criteria within the site evaluation. Additionally, an updated review of the Green Belt Boundary has been undertaken. The Council's Landscape Character Assessment (LCA) (CD/45) was utilised strongly within the Site Evaluation as demonstrated in the methodology. Development will not result in coalescence as suggested.

Loss of peat has also been the subject of concern and it can be confirmed that there is the presence of peat in the southwest corner of the master plan area. This is likely to form part of the integrated green network and potentially will form part of the SuDS drainage scheme.

Issues with noise will be fully assessed through the master plan and planning application process.

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

b) Carbon Emissions**Objections**

Reducing carbon emissions is an agenda that underpins the overall strategy of the Plan, Para 3.1.4 of the Proposed Plan refers. The Council's Environmental Services were consulted on the Proposed Plan but did not raise any points of concern regarding carbon emissions in the vicinity of the site. In line with the Scottish Government emphasis on reduction of carbon emissions, the Development Framework emphasises the importance of measures to reduce carbon and requires developers to promote sustainable transport solutions and to ensure high levels of energy efficiency through house design as advocated by Policy E2: Energy Efficiency and its supporting SPG (CD/31).

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

6) Loss of amenity/character

Objections - The Development Framework strongly references the Scottish Government's Designing Streets (CD/80) and Designing Places (CD/79) and there is a

strong emphasis on place making and design, as further evidenced by Chapter 5 of the Proposed Plan. Character, amenity and integration will be component parts of the design process. It is viewed that any impacts upon the character of the area can be addressed through the policy framework of the Plan and the master plan process.

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

7) Economic and Retail Development

Objections

As demonstrated under Issue 11: Economic Development East Renfrewshire does not have any Strategic Economic Investment Locations (SEIL's) within the SDP, however the SDP acknowledges that there are existing developments and existing locations which will continue to play an important economic, social and environmental role at the local level.

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 Plan provides a flexible approach to economic delivery supporting employment generating uses on such sites.

It is stated that the master plan will have to address the requirement to accommodate 'a high quality environment that will attract a variety of employment generating uses including high tech businesses and the potential for live/work units'. This statement does not imply that a major scale business park is to be created, but it recognises the potential of the area to generate employment. Limited retail employment could be generated within the local neighbourhood retail element proposed. The market for this is explored in further detail in the Development Framework. If a business use was proposed at some point in the future, should market conditions change, this would be assessed through the normal development management process. Policy M2.1 allows that flexibility.

The Council recognises the importance of the investment and the contribution that house building makes to the economy through short and medium term job creation.

The Plan and Development Framework clearly state that retail should be neighbourhood scale (254/1) only to cater for local needs and to provide locally accessible services. The Council anticipate that specifying the size of retail would be unnecessarily restrictive to the commercial market and therefore allows a degree of flexibility when dealing with potential investors. The main aim behind the promotion of local retail provision is to minimise car trips, provide local accessible services for new and existing residents and contribute to the creation of a community, allowing an area where local residents can meet and fulfil their daily shopping requirements.

The scale of retail will be controlled through the master plan and through Policy SG7: Town and Neighbourhood Centre Uses.

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

8) Other**(a) Community consultation and local input to master plan****Objections**

As demonstrated under Issue 3.1 the master plans and resulting planning applications will be subject to further consultation. This will ensure all stakeholders have the opportunity to comment and influence proposals.

Significant consultation has been undertaken at MIR and Proposed Plan stages as outlined in the DPS Participation Statement (CD/52) and Report of Conformity (CD/53). The M77 Corridor Master Plan and Development Framework (CD/44) was a feasibility study commissioned by the Council to inform and advise on development options. There was no requirement for public consultation contained within the Brief. Whilst the M77 corridor study informed the development strategies considered in the MIR it has not been a consideration in the allocation of sites within the plan process.

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

(b) LRV/Incinerator**Objections**

The Council does not promote such a use within the Plan. There is also no current planning application for such a use. There is no proposal or policy that supports such a use within the Plan.

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

(c) Impact upon Property Values**Objections**

Edward Howie (Ref 544/1), Mr and Mrs P Barbary (Ref 566/1), Allan Carvel (Ref 740/1), Standard Letter Comment M2.1A (223 reps) (Ref 995/1)

Reduction in property values is not a planning issue.

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

(d) Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/3) (Additional points not addressed above)

The provisions of Policy M2.1 are not policy controls but are simply a list of requirements, with no indication of what happens if not met. No explicit policy provision that would prevent release or partial release without full infrastructure or developer contributions.

The Council has made it clear that the master plans are required to identify the infrastructure requirements and the development contributions required to support the development. It is for the master plans to identify how the infrastructure or services will be delivered to support the proposed development.

Para 4.5.2 makes it clear that the Council will not consider any applications favourably prior to the adoption of the master plan to ensure a co-ordinated approach to delivery and tied with infrastructure requirements. Within policy M1: Master plans, the Plan states that any application should relate to the master planned area as a whole or if less should not in any way prejudice the implementation of the entire development.

The Council acknowledge that this is a complex and testing issue that requires considerable time and commitment to ensure the detail is rigorous and deliverable. The master plan approach is the correct way to achieve this. Infrastructure issues are recognised and are being thoroughly tested through full assessments of Education, Roads and Transportation, Drainage and visual impact assessments. EIA regulations are also a major consideration.

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

M77 corridor study is self justifying, assuming continuing requirement for large scale residential land release.

The Council sees no justification or evidence for the comments made. The M77 corridor study was undertaken independently by a highly respected consultancy firm. Whilst the M77 corridor study informed the development strategies considered in the MIR it has not been a consideration in the allocation of sites within the LDP process.

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

(B) Policy SG2.9 Malletsheugh East and SG2.10 Malletsheugh West Newton Mearns

Support

John Pollock (Ref 61/1)

The Council acknowledges and welcomes the support for Policy SG2.10.

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

Objections

Mactaggart and Mickel Homes Ltd (Ref 703/1)

The Council considers that these sites should remain part of the master plan to deal with strategic infrastructure requirements, particularly Education, joint access requirements and ensuring appropriate design solutions across the entire master plan area. The policy makes it clear that the Council will not consider any applications favourably prior to the adoption of the master plan to ensure a co-ordinated approach to delivery. Within policy M1 the Council does advise that any application should relate to the master planned area as a whole or if less should not in any way prejudice the implementation of the entire development. On that basis the Council feel it would not be appropriate to amend the wording of 4.5.2.

Comments in relation to the need for a school within the master plan have been accepted and a formal modification stage to the Plan has been undertaken. This matter is addressed further under Issue 7 Ref D13.28 where it is concluded that this alternative site at Waterfoot Road should be retained for a new school.

In order to provide recognition and clarity of this issue and if the Reporter is so minded the Council would be supportive of the Plan being modified as follows.

Para 4.5.4 bullet point 1 sub bullet point 5 should read:

- Education facilities - On site provision of ~~2 primary schools (non-denominational & denominational)~~ *a non-denominational primary school* and associated pre-five provision required as an early priority. *The requirement for a denominational Primary School is provided under Proposal D13.28, Waterfoot Road, Newton Mearns.* Capacity can be managed within other schools subject to provision of appropriate development contributions.

SEPA (Ref 70/25, 70/26) - The Council confirms that a full flood risk assessment will be required prior to development proceeding within the master plan area and this is made clear within the Development Framework. This is addressed above under Point (4).

(C) Policy SG2.11 Maidenhill Newton Mearns

Objections

Cala and Taylor Wimpey (Ref 378/5)

The boundary of the site within the Development Framework includes Maidenhill Farm. This error on the Proposals Map is acknowledged.

Schedule 11: Distribution, Capacity and Phasing of Additions to the Housing land Supply – Master Planned sites, provides capacity and phasing for each of the master plans. The Council maintains that Policy SG3: Phasing of New Housing Development and the plans strategy are in accordance with SPP and that a phasing policy remains a key component of the Plan. This is addressed further under Issue 9.1.

However, as demonstrated under Issue 9.1 if the Reporter is so minded the Council is supportive of providing increased flexibility with the delivery of the master plans up to 2025.

In order to provide recognition and clarity of this issue and if the Reporter is so minded the Council would be supportive of the Plan being modified as follows:

- The Proposals Map is modified to include Maidenhill Farm within the M2.1 boundary.
- Schedule 11 is modified as recommended under Issue 9.1 to refer to minimum capacity upto 2025.
- Policy M2.1 Para 4.5.4 bullet point 2 be modified as follows (additional text in italics):
Approximately 1060 homes to be phased 450 homes (*minimum*) by 2025 and 610 homes post 2025;

SEPA (Ref 70/27) - The Council confirms that a full flood risk assessment will be required prior to development proceeding within the master plan area and this is made clear within the Development Framework. This is addressed above under Point (4).

Stewart Milne Homes (Ref 500/10) - Issues raised concerning effectiveness, landscape character, access, drainage and infrastructure requirements are fully addressed above.

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

(D) Policy SG1 Housing Supply - Garden Centre Malletsheugh

Support

Mathieson Melrose (Ref 971/1)

The Council acknowledges and welcomes the support for the inclusion of this site within Policy M2.1.

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

(E) Policy D13.19 Maidenhill, Malletsheugh, Newton Mearns, Expansion Area – Religious/Community facility

Support

Nazir Ahmed (Ref 755/2) - The Council acknowledges and welcomes the support for the inclusion of this site within Policy M2.1. This issue is addressed further under Issue 7.

Objections

Kathryn Sanderson (Ref 235/2), Iain Donaldson (Ref 252/3), Jane Donaldson (Ref 375/3)

The Council has stated within the Plan that the details of a community/leisure facility (including a potential site for a religious facility) will be determined through the preparation of a comprehensive master plan. The Policy does not state that the facility will be specifically to serve the Muslim community, but is in recognition that a religious facility may be required to serve both the existing and incoming community. The Development Framework will allow for the development of such a facility and identifies preferred locations for such uses within a 2-hub approach to site development.

It should be noted that, following the consultation period on the Proposed Plan, a representation was received from the Muslim community (755/2) that sought allocation of a site for a religious/community facility on a residual parcel of land adjacent to Eastwood High School. In response to this, the Council prepared a pre-examination modification to the Proposed Plan and this has been the subject of further public consultation. This matter is addressed further under Issue 7 Ref D13.29 where it is concluded that this site should not be pursued further.

On the basis of the above recommendation and deletion of the modification site the Council consider it appropriate to continue to retain the potential for the development of a religious/community facility within Policy M2.1 and within Policy D13.5.

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

(F) Policy D13.20 Maidenhill, Malletsheugh, Newton Mearns, Expansion Area – Education**Objection**

SEPA (Ref 70/13) - The Council confirms that a full flood risk assessment will be required prior to development proceeding within the master plan area and this is made clear within the Development Framework. This is addressed above under Point (4).

Strategic Environmental Assessment**Objection****Scottish Natural Heritage (Ref 964/3)**

The comments from SNH are welcomed. The master plan approach allows a holistic strategy to be developed to ensure that the green networks, recreation and biodiversity are priorities and that impacts on existing resources can be suitably managed. Policies D4: Green Network, D7: Green Infrastructure and Open Space Provision within New Development, D8: Natural Features, D9: Protection of Outdoor Access and D10: Environmental Projects demonstrates the importance, protection of these features and provides criteria for assessment for development proposals that will impact upon them. It is viewed that the mitigation measures included within the Development framework and the landscape and green network strategies and planting will ensure environmental impacts are addressed and bio diversity increased.

The council remains supportive of the opportunity to upgrades at Aurs Road. However, it is agreed that references to the former link road through the country park be removed. This was an earlier drafting error.

In order to correct this error and provide clarity if the Reporter was so minded to accept the representation the Council would be supportive of this modification.

Policy M2.2 Para 4.6.4 third bullet**Provision for a sustainable transport strategy comprising:**

- Public Transport Upgrades;
- Provision of a new rail station at Springfield is investigated and land safeguarded;
- Upgrades to Aurs Road, ~~Barnhead to Crookfur Road/M77 link road;~~

Reporter's conclusions:**The underlying principles of Policy M2.1: M77 Strategic Development Opportunity – Malletsheugh/Maidenhill, Newton Mearns**

1. Policy M2.1 of the proposed plan identifies a strategic development opportunity over some 85 hectares to the south west of Newton Mearns. The area is roughly triangular with the M77 forming the western boundary, the built-up area of Newton Mearns providing the north-eastern boundary and, to the south, the A728. This proposal involves the removal of the area from the green belt. The council has prepared a development framework and the project is to be taken forward through the preparation of a comprehensive master plan.

2. The proposed plan states that approximately 1060 houses are proposed of which 450 are phased for the period to 2025 and 610 post 2025. Other specified land uses include neighbourhood scale retail development, community/leisure facilities, including allotments and a potential site for a religious facility, and education provision. A sustainable transport strategy is proposed comprising public transport upgrades, and improved local roads, including reference to the “Balgray Link” route. The Dams to Darnley Country Park is proposed for enhancement by improving access, tourist activity and the encouragement of commercial and leisure activities.
3. Objections to the principle of development relate to the removal of the land from the green belt, the consequential impact on landscape character and inadequate infrastructure. Various parties have expressed general concern about the scale of development and have questioned the need for the number of houses proposed.
4. In terms of the loss of green belt, I consider that Chapter 3 of the proposed plan provides a clear and succinct explanation of the rationale underlying the Development Strategy and Strategic Policies. It is important to note that, where possible, the plan seeks to direct development to brownfield or vacant sites in the urban area, with a continued emphasis on regeneration and consolidation of existing communities. The importance of the green belt is acknowledged with recognition that the release of any land from the green belt should be planned and should form part of the settlement strategy. A review of the green belt boundary has been undertaken to inform the preparation of the proposed plan and to meet the housing requirements of the Strategic Development Plan.
5. To meet the strategic requirements it has been necessary to identify new housing sites including land in the green belt. However, the proposed plan emphasises that the intended release of green belt throughout the plan area involves only a 1.2% reduction in the current total area of the green belt.
6. Scottish Planning Policy requires strategic and local development plans to 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. I shall consider the question of delivering development below but, in terms of the remaining requirements, I believe that the approach of the council has struck a reasonable balance between the need for growth and regeneration.
7. On the foregoing basis, taking into account the conclusions reached in respect of the examination of the development strategy under Issue 2.1.2 and the strategic housing supply under Issue 9.1, I consider that, in principle, the case for proposing green belt release for residential and related development is well founded. Having also noted the arguments for providing a primary focus of growth in areas where development and delivery are controlled through a master planning, phasing and infrastructure provision process, I am satisfied that the concentration of development in three main areas, including Malletsheugh/Maidenhill, Newton Mearns, is justified.
8. Scottish Planning Policy sets out functions of green belt designation, one of which is to protect and enhance the character, landscape setting and identity of a settlement. In this case, as explained, the council has undertaken a green belt review and believes that the development would be well contained by the motorway to the west and the dual carriageway to the south. These features would constitute a firm, long-term green belt boundary. I endorse this opinion.

Infrastructure considerations

9. Various aspects of infrastructure provision have been questioned. These include education, roads and transportation, health provision and drainage and flooding concerns. In general terms, I note that the various service providers have not made any fundamental objections to development within the master plan area. In itself, this is significant.

10. Insofar as education provision is concerned, the proposed plan recognises the priority need for a pre-five facility. The education department has confirmed that secondary capacity can be managed subject to appropriate development contributions.

11. In terms of primary school accommodation, I have noted the current situation whereby a new denominational primary school is to be located at South Waterfoot Road, Newton Mearns. This provision has been included in Schedule 7 under reference D13.28 as a pre-examination modification and considered and confirmed under Issue 7. Although not within the area of Policy 2.1, the council regards the site as being in a preferred educational location. A non-denominational primary school is also required and arrangements for this facility are in hand to provide a site within the master plan area with a proposed opening in 2019. Both new primary schools are to incorporate pre-five provision.

12. On the basis of the foregoing, I am able to conclude that education infrastructure will be available to serve the development within the Policy M2.1 area. In the response to representations on sites SG2.9 and SG2.10, the council has suggested a modification to Policy M2.1 to explain the situation. This is appropriate and paragraph 4.5.4 should be modified accordingly.

13. I accept that, despite concern being expressed over prospective levels of traffic generation, no evidence has been provided to quantify impact. On the other hand, a strategic movement strategy has been incorporated within the development framework and provided the basis for a transport assessment. I note ongoing discussions are continuing with the relevant transport agencies and developers with a view to providing identified junction improvements. This appears to be a prudent approach and leads me to conclude that the Policy M2 master plan area is capable of being provided with a suitable road network.

14. The proposed plan emphasises the intention to provide sustainable transport and I note the council's confirmation of the intention to upgrade public transport and, through a variety of other measures, decrease the use of private cars. The council acknowledges the lack of proximity to a rail link but, nevertheless, I consider the development framework provides the basis for a generally sustainable approach as commended in Scottish Planning Policy.

15. It has been pointed out that the reference in Policy M2.1 to the "Upgrades to Aurs Road, Barrhead ..." is inaccurate. The council has suggested a modification to the third bullet point to clarify this matter. I agree with this proposed modification and, in addition, consider that the final part of the bullet point should also be modified to reflect the council's position on the "Balgray Link". The situation is explained in more detail under Issue 3.2 where, at the council's suggestion, it is recommended that the proposed plan is modified to reflect the current situation.

16. A new health centre is currently under construction at Drumby Crescent, Clarkston (see Issue 3.7) and this will provide services for a wide catchment population. Nevertheless, should additional need arise within the area of Policy M2.1, scope for further provision is included under Policy D13 and, in particular, allocation D13.19 which provides for "Community/leisure facilities". I am therefore satisfied that the proposed plan offers an appropriate basis to address any health care issues. I also note and support the commitment to general well being through improved green networks, sports and leisure facilities supported by pedestrian and cyclist routes.

17. Concern has been expressed about the potential for flooding across the site and the Scottish Environment Protection Agency has advised of the need for a flood risk assessment. However, the site is not within a functional flood plain and I note the Flood Map shows that only relatively limited parts of the site lie within the 1:200 year Fluvial Extent. On this basis it would appear that the terms of the relevant policies of the proposed plan would be adequate to allow flood risk matters to be dealt with through development management procedures. However, the council is content for the proposed plan to be modified to include a specific reference to flood risk assessment throughout the master plan area. Indeed, this is stipulated in the development framework and I accept this to be a prudent measure.

18. Significant investigation has already been initiated with a hydrological study to inform on surface water drainage and initial drainage impact assessments. The indications are that the site is capable of satisfactory drainage utilising sustainable systems. In this respect, I have noted the objections relating to private watercourses. Although concern has been expressed about the rights of the individual owners, I have no substantive evidence to show that the council is involved in any illegal activity in this respect. I accept that the scale of development proposed may well have drainage implications. However, I have no reason to believe that the existence of private watercourses would represent an insurmountable technical constraint. Indeed, I also note that there are currently flooding issues and it may be that the proposed master plan would enable existing problems to be assessed as part of the wider drainage impact studies. A pumping station and sewer reinforcements are anticipated but Scottish Water has indicated that lack of capacity should not be regarded as a barrier to development.

19. All-in-all, I am satisfied that infrastructure provision does not represent a significant constraint to development. In reaching this conclusion, I am aware of the criticism of those who claim failure to provide adequate infrastructure and services to support previous developments. However, I believe that development contributions are capable of ensuring the necessary level of provision, including the two new primary schools referred to above. In this respect, it is significant that the council has stated that there is broad agreement with the developers. The support of potential developers within the area of Policy M2.1 endorses the council's opinion. On this basis I am satisfied that the development is capable of proceeding.

Environmental considerations

20. The site is not subject to any formal nature conservation designation. Nevertheless, the development framework has been prepared in liaison with Scottish Natural Heritage and the Glasgow and Clyde Valley Green Network Partnership. I can accept that an emphasis on providing a strong green network within the site would be beneficial. Peat deposits in the south-west part of the site are likely to be incorporated within the green network and also form part of the sustainable drainage scheme.

21. Although an increase in carbon emissions has been the subject of concern, the development strategy of the proposed plan is clear in its recognition of climate change and the challenges this presents. Inevitably, proposed development, especially development involving the release of green belt land, gives rise to tensions, especially in respect of the potential for increased emissions. On the other hand, the development framework emphasises that sustainable development is at the heart of all designs. For example, the framework places emphasis on the need to promote sustainable transport solutions and ensure high levels of energy efficiency through house design.

22. It is also clear from the development framework that a strong emphasis on place-making and design will be expected in terms of Scottish Government guidance set out in Designing Streets and Designing Places. I am therefore satisfied that in general terms, the proposed plan provides scope for development respecting the principle of sustainability. Scottish Planning Policy encourages this approach. In detail, there is every reason to expect that the principle of sustainability will be reflected through all development aspects within the area of Policy M2.1.

Economic and Retail Development

23. I agree that the master plan should refer to the possibility of including employment generating uses and that this reference should be framed in a flexible and non-restrictive manner. I am confident that the context of the master planned development with its emphasis, as described, on high quality sustainable development, will ensure incoming employment uses are commensurate to the character of the area. Indeed, employment uses within the area of Policy M2.1 would be sustainable insofar as they would have the ability to reduce travel-to-work journeys. I therefore endorse the terms of Policy M2.1 in this respect.

24. Whilst a quantified retail floorspace has been requested, I believe the indication that “neighbourhood scale” is a reasonable description of the level of provision the council anticipates. I therefore accept that the proposed plan should be required to be no more specific and that further details will evolve as the master plan process progresses. Policy SG7, Town and Neighbourhood Centre Uses, also provides relevant guidance for the development management process.

Policy SG2.9, Malletsheugh East and SG2.10, Malletsheugh West

25. The concept of a master plan area is well founded and the wider area itself provides a cohesive and well-contained series of development allocations. On this basis, and taking into account the examination of the wider housing land supply, phasing and infrastructure provision, it is appropriate that sites SG2.9 and SG2.10 should be contained within the master plan area designated under Policy M2.1.

26. The location of the proposed denominational primary school has been considered under Issue 7 and is also dealt with above under Infrastructure Considerations. In short, it is now proposed to provide the new denominational primary school at Waterfoot Road, Newton Mearns, beyond the boundary of the master plan area. This is shown in Schedule 7 under reference D13.28 and also explained in a recommended modification to paragraph 4.5.4 in Policy M2.1.

Policy SG2.11, Maidenhill

27. I accept that the boundary of the master plan area shown on the Proposals Map should be consistent with that in the development framework and, indeed, Figure 6 of the proposed plan. Figure 6 shows Maidenhill Farm included within the area of Policy M2.1.

28. The conclusions under Issues 2.1.1, 2.1.2 and 9.1 find that adequate housing land has been provided in line with the requirements set out in the strategic development plan. On this basis, the concept of identifying a “minimum” capacity up to 2025 was not accepted in a strategic context. In turn, it is not regarded as appropriate to introduce the additional flexibility in Policy M2.1 at paragraph 4.5.4. Policy SG3 on the phasing of new housing development would already permit the release of safeguarded sites before 2025 if necessary to maintain a 5 year housing land supply. This provides adequate flexibility.

Policy D13.19, Religious/Community Centre

29. As pointed out by the council, the proposed plan makes only a general reference to a potential site for a religious facility. This is an entirely reasonable approach and offers the opportunity to provide a facility (for whatever religion or religions) which would contribute to creating a balanced community within the master plan area and, probably, beyond.

Other matters

30. The council points out that the plan preparation process has already involved significant consultation. An undertaking has been given that master plans and subsequent planning applications will provide further consultation opportunities. On this basis, there is no reason to expect that there will be inadequate levels of future consultation and public participation. The proposed plan requires no modification in this respect.

31. Concerns have been expressed about the problems that might arise in the event of only partial development taking place. However, I believe the proposed plan provides an important link between the approved development framework and, as the next stage, the preparation of the master plan. This is a well-founded approach and the clear support from willing developers justifies the allocations in the proposed plan. The preparation of the master plan will provide a clearer opportunity to assess the progress towards implementation. For instance the assessed level of development contributions will become clearer and enable forward planning of infrastructure provision. All-in-all, I conclude that the proposed plan has adopted an entirely acceptable approach to the planning of an urban expansion area.

32. It has been suggested that the implementation of the master plan proposals would have an adverse impact on property values. This claim is unsubstantiated but, in any event, property values are not normally a land use planning consideration.

33. Although concern has been expressed at the prospect of the construction of an incinerator, no reference to this effect is included in the proposed plan.

Reporter's recommendations:

I recommend that the following modifications be made:

1. In Policy M2.1, paragraph 4.5.4, bullet point 1: delete sub-bullet point 5 and replace with:

“Education facilities – On-site provision of a non-denominational primary school and associated pre-five provision required as an early priority. The requirement for a denominational primary school is provided under Proposal D13.28, South Waterfoot Road, Newton Mearns. Capacity can be managed within other schools subject to provision of appropriate development contributions.”

2. In Policy M2.1, paragraph 4.5.4, third bullet point, replace sub-bullet point 2 as follows; “Upgrades to Aurs Road”

Note: under Issue 3.2, the following modification to sub-bullet point 3 is recommended:

“Investigate improvements to connectivity between Barrhead and Newton Mearns including, in the long term, the ‘Balgray Link’ route.”

3. In Schedule 11, in the row “M2.1, Malletsheugh/Maidenhill SDO” insert in the “Notes” column, “*****” and add to the note field for Schedules 10 and 11: “***** flood risk assessments required throughout the areas of Malletsheugh/Maidenhill, Newton Mearns SDO and Barrhead South SDO” (see also Issue 3.4)

4. The Proposals Map should include Maidenhill Farm within the boundary of Policy M2.1 and reflect the boundary shown in Figure 6.

Issue 3.4	BARRHEAD SOUTH – SPRINGHILL, SPRINGFIELD, LYONCROSS	
Development plan reference:	Policy M2.2: M77 Strategic Development Opportunity - Barrhead South – Springhill, Springfield, Lyoncross	Reporter: Richard Dent
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Proposed Plan Stage</u> Jean S C Hutchison (Ref 57/1) SEPA (REF 70/10) (Ref 70/28) (Ref 70/29) (Ref 70/30) (Ref 70/31) (Ref 70/50) Miller Homes SW (Ref 77/1) (Ref 77/4) Mr and Mrs P Layden and Richard Layden (Ref 86/6) (Ref 86/7) Scottish Natural Heritage (Ref 88/2) Co-operative Group (Ref 254/2) Scottish Water (Ref 256/3) Wallace Land Investment and Management (Ref 331/1) (Ref 331/8) Glasgow City Council (Ref 465/2) Stewart Milne Homes (Ref 500/5) (Ref 500/6) (Ref 500/7) (Ref 500/8) (Ref 500/9) Andrew Gray (Ref 501/4) Julie Cameron (Ref 507/1) Edward Kelly (Ref 655/1) (Ref 655/2) (Ref 655/3) Persimmon Homes Ltd (Ref 743/12) Nazir Ahmed (Ref 755/3) D Jesner (Ref 783/5) Eileen Ross (Ref 923/1) Barrhead Community Council (Ref 924/6) Auchenback Tenants and Residents Association (Ref 938/6) (Ref 938/7) Scottish Natural Heritage (Ref 964/4) Dalton Demolition (Ref 968/1)</p> <p><u>Modification Stage</u> Elizabeth Reid Wilson (Ref 1319/1, 1319/2)</p>		
Provision of the development plan to which the issue relates:	Chapter 4: Key Areas for Change and Settlement Strategies Para. 4.6 – 4.6.4 – Policy M2.2: M77 Strategic Development Opportunity - Barrhead South – Springhill, Springfield, Lyoncross Figure 7: Policy M2.2: M77 Strategic Development Opportunity - Barrhead South – Springhill, Springfield, Lyoncross Policy D13.5: Barrhead South expansion Area – Community/Leisure (Religious) Facilities Policy D13.6 Barrhead South Expansion Area – Education Facilities Policy SG2.12 Lyoncross, Barrhead Policy SG2.13 Springfield Road, Springhill Road, Barrhead Policy SG2.14 Springfield Road, Balgraystone Road Barrhead Policy SG2.15 Springhill Road, Barrhead Policy SG10.4 Springfield, Barrhead New Site: Springfield House (Proposed SG2.7) Strategic Environmental Assessment Schedule 10: Distribution, Capacity and Phasing of Additions to the	

	Housing land Supply. Strategic Environmental Assessment Site Evaluation Action Programme
Planning authority's summary of the representation(s):	
<p><u>(a) Policy M2.2: M77 Strategic Development Opportunity - Barrhead South – Springhill, Springfield, Lyoncross and Strategic Environmental Assessment</u></p> <p><u>Support</u></p> <p><u>Miller Homes SW (Ref 77/4)</u> - Support policy</p> <p><u>Mr and Mrs P Layden and Richard Layden (Ref 86/6)</u> - Sets out a justified and sound basis to enable development to take place in a sustainable manner in accordance with NPF and SPP.</p> <p><u>Scottish Natural Heritage (Ref 88/2)</u> - We recommend that reference within Policy M2.1 and M2.2 to “Upgrades to Aurs Road, Barrhead to Crookfur Road / M77 link road” should be removed as this was the wording used to describe the now abandoned Barrhead/M77 link road through the middle of the Country Park which appears in the currently adopted Local Plan.</p> <p><u>Scottish Water (Ref 256/3)</u> - Support and will work closely with Local Authority and participate in the masterplan process.</p> <p><u>Wallace Land Investment and Management (Ref 331/1)</u> Support inclusion of site - can accommodate 300 homes and can be delivered in initial plan period. Support Council's repositioning of Green Belt Wallace Land wishes to support the Council and other key stakeholders to define and agree the masterplan principles and requirements for this growth area as part of the preparation of the SPG. Further engagement on this SPG is therefore welcomed prior to the adoption of the LDP. The Springfield Road/Springhill Road site (ref: LDP45A) by Wallace Land is confirmed as effective in accord with PAN 2/2010, and can be delivered as part of the Masterplan Area M2.2 during the period of the LDP. The evidence to confirm this site's effectiveness is set out in the Development Framework Report (attached) and the Statement of Site Effectiveness (attached). The site's effectiveness is also acknowledged by the Council in its Site Evaluation. Site LDP45A (SG2.13) supported for inclusion as part of Masterplan M2.2.</p> <p><u>Andrew Gray (Ref 501/4)</u> - Support regeneration of Barrhead</p> <p><u>Nazir Ahmed (Ref 755/3)</u> - Support development but do not support site for allocation of Muslim religious facility (D13.5)</p> <p><u>Objections</u></p> <p><u>Jean S C Hutchison (Ref 57/1)</u> SG2.14 site as part of M2.2: object to proposal for 1050 homes effect on already poor water pressure</p>	

SG8.1/SG6.18 site as part of M2.2:
 object to economic development in neighbouring fields
 no details of what is planned
 Object on ground of increased traffic:
 Springfield Road is a rat run to Neilston
 Bridge cannot cope with current traffic
 Road cannot cope with current traffic from school

Co-operative Group (Ref 254/2) - Objection to lack of detail on retail

Wallace Land Investment and Management (Ref 331/8) - Object to phasing of site - phasing should be market led and future growth should not be restricted. SPP does not require LDPs to phase sites.

Stewart Milne Homes (Ref 500/5)

Identification of the areas covered by the M77 SDO (M2) are fundamentally the wrong locations to promote substantial growth within East Renfrewshire. Based on landscape, transport and planning issues.

Landscape:

Greenbelt Landscape Character Assessment 2005 identifies sites within the M2 area (LDP42 Lyoncross, LDP44 Springhill/Springfield Road and LDP12A/B Maidenhill) as Priority Areas for Landscape Protection but these have still been allocated

It also identifies areas along the urban edge for small scale development only

The Site Evaluation states the Greenbelt Landscape Character Assessment 2005 has been used but this is not apparent

Scale of development and cumulative impact are important for this area and seem to have been missed in preparation of the plan.

The Plan relies heavily on releasing several large sites of questionable effectiveness and substantial infrastructure costs (when alternatives exist) in order to pursue other objectives Para 4.3.1., bullet 1, is refuted in that development sites have not been directed to areas of less environmental quality and sensitivity that will provide defensible Green Belt boundaries

Transport:

no business case for Balgray Link Road, considerable financial cost and will exacerbate traffic on M77 – detailed cumulative impact on traffic has not been done

Concerned Balgray Link Road is to be phased and linked to Country Park development. Surely if required for housing it should be developed first

Planning:

M77 Masterplan Report states that the current planning policy framework is not necessarily supportive of the vision in the masterplan. The SDP, through the HNDA communicates concerns with regard to significant Green Belt release and strategic housing allocations.

Alternative Green Belt residential release sites exist and the sites within the M77 SDP have been chosen in order to pursue other objectives.

Julie Cameron (Ref 507/1)

Schools have not been considered and schools at capacity presently (in relation to new housing proposed)

No mention of upgrading Barrhead High or Cross Arthurlie , no mention of St Marks School upgrading should be a priority

Edward Kelly (Ref 655/2)

Loss of privacy, outlook (respondents home 200m from site)
 Loss of property value
 Potential Brownfield sites have been overlooked in place of these sites
 Will box in property
 Green Belt loss

Persimmon Homes Ltd (Ref 743/12)

The Council have allocated units post 2025 the programming which has been attributed to these areas up to 2020 is unrealistically high and unlikely to deliver the numbers which they are anticipating. This somewhat clouds the overall five year effective land supply figure and will create a further shortfall.

The Council may wish to reassess the requirement to provide indicative programming in order to encourage development to be considered wholly prior to indicatively phasing delivery. This also enables smaller sites, without the requirement for a masterplanning exercise to come forward in the interim and deliver units within the plan period, something which Masterplan sites are unlikely to achieve.

Eileen Ross (Ref 923/1)

Contrary to other LDP policies
 Increase in traffic, congestion, emissions
 Springfield Country Park, loss of amenity
 Will not enhance Green Network and leisure opportunities
 Flood risk
 Wildlife loss
 Green Belt designation removed at will for LDP it should be there to protect residents
 Loss of rural character
 Loss of amenity and quality of life for existing residents
 Air/soil, peat, water impacts
 Impact on health and well being of existing residents
 Development not in keeping with surroundings
 Loss of privacy and sunlight
 No proven need for religious facility
 Live/work units cause disruption and should not be in residential areas

Barrhead Community Council (Ref 924/6), Auchenback Tenants and Residents Association (Ref 938/6) (Ref 938/7)

Pleased to see continuing support of Dams to Darnley Country Park, support enhancement and safeguarding
 Concerned of the definition of the area of the country park and inconsistencies in plan
 Concerned about removal of vast areas of Green Belt
 Land east of Aurs Road, Lyoncross is considered to be in Country Park
 Consider Aurs Road, Lyoncross to be the most obvious and clear long term defensible boundary to Barrhead and object to development
 Development at Lyoncross will negatively impact on the setting of the Country Park
 Concerned development here will lead to further development in the future
 No clear proposals
 No reference to community involvement in masterplans
 Green Belt loss
 Traffic impacts
 Lack of detail over Balgray Link

(Ref 938/7) Impact on facilities

Areas within Dams to Darnley Country Park should be protected

Concerned about implications from the Country Park as expressed in the M77 Corridor Masterplan (page 18, para 4), concerned this is cover-up for will to develop Country Park

No justification given for development needs over needs for protection of Country Park

Loss of Green Belt

Lack of public dialogue

Balgray Link unnecessary

Scottish Natural Heritage (Ref 964/4)

The assessment of M77 Master Plan sub-area M2.2 against the SEA Environmental Objectives generally seems sound as it will have a degree of negative impacts, partly related to the fact that it will introduce development to an area of the Dams to Darnley Mill Country Park adjacent to Barrhead. The impacts of M77 Master Plan sub-area M2.2 on protecting, enhancing and creating green spaces important for recreation and biodiversity in particular have been assessed as being both positive and negative. Positive impacts are possible if the suggested sustainable transport network is delivered which could help people to access the Country Park (a recognised problem at present). However negative impacts are also possible if development here restricts the ability of the land in question to be realistically managed as a Country Park – i.e. with recreation and biodiversity as management priorities. The stated need to try and protect the area's several Local Biodiversity Sites (LBSs) through appropriate design layout is welcome. However the challenges this presents in addition to the introduction of development to a corner of the Country Park more generally explains the assessment of impacts on biodiversity as being "unknown or unclear". SNH agrees that the two housing allocations which include LBSs (SG2.12 and SG2.16) will have negative impacts in terms of Environmental Objective 1 - protecting, enhancing and restoring biodiversity.

Achieving successful development of SG2.12 in particular – i.e. housing development which does not result in unacceptable impacts to the LBSs or the recreational experience of the Country Park, while at the same time allowing for delivery of the proposed access and other Country Park facility improvements that are linked to M77 Master Plan sub-area M2.2 – is likely to be one of the most significant challenges the planning authority will face in implementing the LDP.

As a final point, SNH would draw the planning authority's attention to the fact that the list of bullet points outlining the various elements of the proposed development in M77 Master Plan sub-area M2.2 given in section 3.4.3 of Appendix 3 continues to list "Upgrades to Aurs Road, Barrhead to Crookfur Road/M77 link road". As this was the wording used to describe the now abandoned Barrhead/M77 link road through the middle of the Country Park which appears in the currently adopted Local Plan we would suggest that alternative wording may be better to describe the currently proposed Balgray Link.

Dalton Demolition (Ref 968/1)

Rail station should be developed as first phase of plan

(b) Policy D13.6 Barrhead South Expansion Area – Education Facilities**Objection**

SEPA (Ref 70/10) - Assessment of flood risk required.

(c) Policy SG2.12 Lyoncross, Barrhead**Support****Mr and Mrs P Layden and Richard Layden (Ref 86/7)**

Support site identification, phasing and capacity for 170 units and as part of M2.2.
Site is effective and deliverable.

Objection

SEPA (Ref 70/28) - Assessment of flood risk required.

Glasgow City Council (Ref 465/2)

Significant loss of Green Belt between Glasgow and Barrhead
Private sector land identified is more than 25% in excess of SDP requirements, deletion of this site would still be in compliance with SDP requirements for a generous land supply (leave 20% in excess)
Within the boundary of Dams to Darnley Country Park, park was Green Belt stabilisation project, would not accord with 2004 masterplan or Development and Management Plan
Housing in the park would undermine the reason it was established and set a precedent for further development

Stewart Milne Homes (Ref 500/6)

No clearly identifiable or defensible boundary putting Green Belt status of neighbouring land in doubt

The Greenbelt Landscape Character Assessment and assessment by Mark Turnbull Landscape Architects as requiring protection and conservation, contributing to the landscape character and further development should be contained

No evidence the cumulative impact of all the sites, including this one, have been considered

Very sensitive site in landscape terms - steep nature of the site, the lack of a defensible eastern boundary and the protection recommended by the Green Belt Landscape Character Assessment and the sensitivity of the site in landscape and visual terms, it is submitted that the site at Lyoncross, Barrhead should not be identified in the emerging East Renfrewshire Local Development Plan as a residential development site

Concerns noted by Dougall Baillie Associates on foul drainage capacity and pumping will be required to existing sewer network in western area of site, topography change in level by 50m from high point to centre, power lines from western boundary to eastern boundary
Consider viability and effectiveness barriers to development of site

Unrealistic to expect development within lifetime of plan due to constraints

Site is ineffective

Comparison score with Barrance Farm site shows Barrance Farm (LDP08 and LDP010) to be a better site

D Jesner (Ref 783/5)

Removal from Green Belt in contravention of policy
Lyoncross scored over-favourably in Site Evaluation

(d) Policy SG2.13 Springfield Road, Springhill Road, Barrhead**Objections****SEPA (Ref 70/29)**

Assessment of flood risk required.

Stewart Milne Homes (Ref 500/9)

Council have not considered cumulative impact of all the sites

Disagree with scoring for site - intrusion into Green Belt, effect on longterm integrity of the Green Belt, effect on an area of Green Belt listed as requiring protection and conservation and moderate to strong value

Site would expose further areas of the Green Belt to development pressure due to lack of strong boundaries between Barrhead and Neilston

Without development of LDP44 stronger Green Belt boundaries not created

No frequent bus services within 400m

Services/facilities - over 400m to primary school and in excess of 1000m to neighbourhood centre

Site does not meet criteria in Site Evaluation document for Effectiveness and Accessibility to Services/Facilities

Issues with foul drainage, would require bridge for watercrossing if centre of the site used for drainage, Water

Impact Assessment required, undulating and steep site, overhead power lines

Above issues question effectiveness and marketability of site

Nearby Springfield Road site undeveloped despite allocation since 2001

Barrance Farm is a better site

Edward Kelly (Ref 655/3)

Loss of privacy, outlook (respondents home 200m from site)

Loss of property value

Potential Brownfield sites have been overlooked in place of these sites

Will box in property

Green Belt loss

(e) Policy SG2.14 Springfield Road, Balgraystone Road Barrhead**Objection****SEPA (Ref 70/30)**

Assessment of flood risk required.

Stewart Milne Homes (Ref 500/8)

Council have not considered cumulative impact of all the sites

Disagree with scoring for site - intrusion into Green Belt, effect on longterm integrity of the Green Belt, effect on an area of Green Belt listed as requiring protection and conservation and moderate to strong value

Access issues - Site requires single access and has limited frontage to Springfield Road but substantial to Balgraystone Road, neither roads have a footway, speed limit would need to be reduced, poor visibility - it is considered a suitable junction could not be devised for Springfield Road/Balgraystone Road to accommodate development of this site

No frequent bus services within 400m

Services/facilities - over 400m to primary school and in excess of 1000m to neighbourhood centre
 Site does not meet criteria in Site Evaluation document for Effectiveness and Accessibility to Services/Facilities
 Foul drainage, no outfall for 40% of site, reinforcement of water supply and topography issue affect site
 Significant investment would be required to develop the site based on the issues identified making development in plan period unlikely
 Issues and low densities make the site of questionable effectiveness
 Nearby Springfield Road site undeveloped despite allocation since 2001
 Barrance Farm is a better site

Edward Kelly (Ref 655/1) - Section of site bordering Springfield Road is land that belongs to Springfield House and is owned by respondent

(f) Policy SG2.15 Springhill Road, Barrhead

Support

Miller Homes SW (Ref 77/1)

Support inclusion of site as part of Barrhead SDO, Policy M2.2
 Committed to joint working
 Agree with masterplanning approach and general terms of masterplanning requirements subject to further detailed studies
 Important to recognise the level of planning gain will be more modest than for the M2.1
 Effective in terms of PAN2/2010

Objection

SEPA (Ref 70/31) - Assessment of flood risk required.

Stewart Milne Homes (Ref 500/7)

Council have not considered cumulative impact of all the sites
 Disagree with scoring for site - intrusion into Green Belt, effect on longterm integrity of the Green Belt, effect on an area of Green Belt listed as requiring protection and conservation and moderate to strong value
 Site will be intrusion into the Green Belt
 No bus service within 400m walk
 Significant off-site drainage work required, no watercourses on site to provide outfalls to the north due to topography will be deep water Impact Assessment will be required, topography and drainage issues, overhead power lines
 Effectiveness and marketability questioned
 Nearby Springfield Road site undeveloped despite allocation since 2001
 Barrance Farm is a better site

(g) Policy SG10.4 Springfield, Barrhead

Objection

SEPA (Ref 70/50) - Assessment of flood risk required.

(h) Modification Stage**Objection****Elizabeth Reid Wilson (Ref 1319/1, 1319/2)**

(1319/1) Support M2.2, and request that Springhill Woodland be included within the Masterplan Area for residential developments. Objects to Policy D5: Protection of Urban Greenspace.

(1319/2) Proposal for Change of Zone in the Indicative Draft Masterplan for our land at Springfield House Woodland, Springfield Road Springhill, for rezoning from Urban Greenspace to discrete Keyhole Housing Development located within the 4 acres zoned now as Urban Greenspace.

Springhill Woodland be included within the Masterplan Area for residential developments
Include Springhill Woodland within M2.2 Area

Modifications sought by those submitting representations:**(a) Policy M2.2: M77 Strategic Development Opportunity - Barrhead South – Springhill, Springfield, Lyoncross**

Scottish Natural Heritage (Ref 88/2) - Alternative wording may be better to describe the currently proposed Balgray Link to prevent confusion

Jean S C Hutchison (Ref 57/1), Julie Cameron (Ref 507/1), Edward Kelly (Ref 655/2), Eileen Ross (Ref 923/1)

Delete Policy M2.2 Strategic Development Opportunity and retain land as Green Belt. Proposal will result in negative impacts upon infrastructure (roads, schools, drainage), the environment and will not deliver social or economic benefits.

Strategy should focus on delivery of Brownfield sites only.

Develop Country Park as tourist attraction.

Co-operative Group (Ref 254/2) - Define size/threshold of retail floor space to ensure it is at neighbourhood scale.

Wallace Land Investment and Management (Ref 331/8) - The 2nd bullet point in para. 4.6.4 is removed from Policy M2.2, in accordance with SPP and to provide flexibility.

Stewart Milne Homes (Ref 500/5)

A strategy which allows for proposed housing relates sites to be less concentrated, smaller and more widely dispersed would have a lesser impact on M77 than the concentrated development proposed.

Persimmon Homes Ltd (Ref 743/12)

East Renfrewshire Council should ensure that the indicative capacity of housing units proposed as part of the 'Strategic Development Opportunity' sites do not prejudice 'oven-ready' housing sites coming forward by allocating too many units associated with the Masterplan developments within the plan period, which are unlikely to be delivered.

D Jesner (Ref 783/5)

Removal from Green Belt.

Lyoncross scored over-favourably in Site Evaluation

Rena McGuire, Barrhead Community Council (Ref 924/6), Auchenback Tenants and Residents Association (Ref 938/6) (Ref 938/7)

Amend Local Plan to keep M77 Corridor in Green Belt until masterplan has been prepared and consulted on by local community.

Dalton Demolition (Ref 968/1) - Rail station should be developed as first phase of plan

(b) Policy D13.6 Barrhead South Expansion Area – Education Facilities

SEPA (Ref 70/10) - Flood risk assessment required.

(c) Policy SG2.12 Lyoncross, Barrhead

SEPA (Ref 70/28) - Flood risk assessment required.

Glasgow City Council (Ref 465/2) - Deletion of Lyoncross site

Stewart Milne Homes (Ref 500/6)

Site should not be identified within LDP

Barrance Farm should be allocated

In Site Evaluation change effectiveness scoring from -3 to -6 and overall score from -4 to -7.

(d) Policy SG2.13 Springfield Road, Springhill Road, Barrhead

SEPA (Ref 70/29) - Flood risk assessment required.

Stewart Milne Homes (Ref 500/9)

Site should not be identified within LDP

Barrance Farm should be allocated

Edward Kelly (Ref 655/3) - Delete site from Plan.

(e) Policy SG2.14 Springfield Road, Balgraystone Road Barrhead

SEPA (Ref 70/30) - Flood risk assessment required.

Stewart Milne Homes (Ref 500/8)

Site should not be identified in LDP and not form part of M77 SDO

Change effectiveness score in Site Evaluation from -3 to -6, Accessibility to

Services/Facilities from 3 to 0, overall score from -7 to -13

Barrance Farm should be allocated

Edward Kelly (Ref 655/1)

Section bordering Springfield Road belongs to Springfield house - Remove section of site SG2.14 from plan

Objector holds title to land.

(f) Policy SG2.15 Springhill Road, Barrhead

SEPA (Ref 70/31) - Flood risk assessment required.

Stewart Milne Homes (Ref 500/7)

Site should not be identified in LDP and not form part of M77 SDO
 Scoring in Site Evaluation Q3 changed from -3 to -6, effectiveness from 0 to -6, total score from -3 to -12.
 Barrance Farm should be allocated

(g) Policy SG10.4 Springfield, Barrhead

SEPA (Ref 70/50) - Flood risk assessment required.

(h) Strategic Environmental Assessment**Scottish Natural Heritage (Ref 964/4)**

Plan requires to give careful attention to delivery of Lyoncross site (SG2.12) to prevent negative impacts upon LBS or Country Park.
 Alternative wording required to describe proposed link road.

(i) Modification Stage**Elizabeth Reid Wilson (Ref 1319/1, 1319/2)**

Request that Springhill Woodland be included within the M2.2 Masterplan Area for discrete Keyhole Housing Development.
 Removal of Policy D5: Protection of Urban Greenspace.

Summary of responses (including reasons) by planning authority:**(a) POLICY M2.2: M77 STRATEGIC DEVELOPMENT OPPORTUNITY – BARRHEAD SOUTH – SPRINGHILL, SPRINGFIELD, LYONCROSS AND STRATEGIC ENVIRONMENTAL ASSESSMENT****Support****Miller Homes SW (Ref 77/4), Mr and Mrs P Layden and Richard Layden (Ref 86/6), Scottish Water (Ref 256/3), Wallace Land Investment and Management (Ref331/1), Andrew Gray (Ref 501/4), Nazir Ahmed (Ref 755/3)**

The Council acknowledges and welcomes the support for Policy M2.2 and the partnership approach to prepare the master plan. Support of regeneration of Barrhead is noted and welcomed.

The policy allows for a potential religious facility site not a Muslim Religious facility (D13.5). ERMEC's lack of interest in this site for a religious facility is noted. There have been no other representations received to the Proposed Plan demonstrating interest in such a facility at this location at this time however it is considered appropriate to retain the potential for the development of a religious/community facility within Policy M2.2.

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

Objections**Jean S C Hutchison (Ref 57/1), SEPA (REF 70/10) (Ref 70/28) (Ref 70/29) (Ref 70/30) (Ref 70/31) (Ref 70/50), Co-Operative Group (Ref 254/2), Stewart Milne Homes (Ref 500/5), Edward Kelly (Ref 655/2), Eileen Ross (Ref 923/1), Barrhead Community Council (Ref 924/6), Auchenback Tenants and residents Association (Ref 938/6,**

938/7), Dalton Demolition (Ref 968/1)

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council's approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

Policy M2.2 is critical to the delivery of the Council's long term vision and development strategy for East Renfrewshire. To ensure the development is carried out in a manner that delivers the Council's vision and delivers development in a sustainable way, the Plan makes it clear that the site will be master planned. The first stage of this process is the preparation of a Development Framework (CD/23). This document was approved by East Renfrewshire Council at its meeting of 29th January 2014.

The master plan will be adopted by the Council as Supplementary Planning Guidance. Justification for the master plan process is set out further under Issue 3.1.

The Development Framework has involved initial site assessments including transportation and access, ecology, archaeology, services, ground conditions, drainage and landscape visual impact. This work has established the effectiveness of the sites, development potential, infrastructure requirements and development viability. Concerns about individual sites are addressed below.

The Council retains the view that this master plan area is a natural extension to the urban area and will be defined by long term defensible boundaries. A clear mitigation strategy is in place to address any environmental issues as demonstrated in the Development framework.

The area of land released from the green belt under policy M2.2 is limited to that to the north of the railway line. Policy M2 identifies the wider M77 strategic development opportunity within which the two master plan areas at Barrhead South and Newton Mearns are located. It is these two areas (policy M2.1 and M2.2) that have been released from the green belt.

Landscape and green belt impact, environmental quality and visual sensitivity were key criteria within the site evaluation. Additionally, an updated review of the Green Belt Boundary has been undertaken. The Council's Landscape Character Assessment (LCA) (CD/45) was utilised strongly within the Site Evaluation (CD/09) as demonstrated in the methodology. The methodology employed, together with the SEA provides a consistent and objective framework for the assessment of the land use proposals. The sequential approach is used to assist in identifying the most suitable sites to release for new development and is in line with SPP. Whilst the M77 corridor study informed the development strategies considered in the MIR it has not been a consideration in the allocation of sites within the LDP process.

Potential Brownfield sites have been considered and the Plans strategy includes Policy M3: Strategic Development Opportunity – Shanks/Glasgow Road Barrhead which seeks to bring the majority of Brownfield land in Barrhead back into productive use including through significant residential allocations.

The Council confirms that a full flood risk assessment will be required across the master plan area prior to development proceeding and this is made clear within the Development Framework. This assessment will be carried out to inform the preparation of the master plan. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals. The concerns raised in terms of the potential impact on water pressure have been considered in principle within the development framework and does not present any issues that would prevent the principle of development. A drainage/water impact assessments will be required as part of any planning application. Scottish Water has expressed their support for the Councils approach and their commitment to work in partnership with the Council through the master plan process.

The master plan will be required to deliver a strong green network creating links through development to the countryside and improving accessibility to Darnley country park creating improved opportunities for leisure activities. The development framework demonstrates that these principles will be achieved by the site.

The preparation of the master plan will consider the employment generating uses and the scale, nature and location of the retail provision proposed. Policy M2.2 and Policy SG7: Town and Neighbourhood Centre Uses allow for retail at a neighbourhood scale which is considered appropriate in scale for this location.

The potential for live/work units to deliver a dynamic and competitive local economy and boost local jobs is considered appropriate for the site. The amenity issues with regards to the functioning of live/work are more appropriately addressed through the detailed design of development layouts and this will be considered through the master plan process and consideration of detailed planning applications.

Policy M2.2 requires the master plan to address the requirement for a sustainable transport strategy including public transport upgrades and the provision of a new rail halt. The location of the site allows this opportunity to provide significant public transport opportunities that would reduce car use. The phasing of the development including infrastructure and rail station will be considered and determined during the preparation of the master plan (Ref 968/1).

Consultation with Transport Scotland (TS) with regards to the transportation and access strategy for this site has been ongoing with TS being involved in Transport Option Appraisal (July 2013) that was carried out to inform the transportation and access strategy for the development framework.

A detailed assessment of the cumulative impact of traffic is more appropriately dealt with during detailed consideration of the master plan and planning application stage. Consideration of the transport options for the site and access strategy has been carried out to inform the development framework.

Policy M2.2 required the master plan process to investigate the Balgray Link route as part of the sustainable transport strategy for the site. The Balgray Link was not a justification for the release or an essential requirement of the master plan. The infrastructure requirements and development viability consideration of the development framework has identified that the Balgray Link is not required to realise the development of the site and that the cost implications would have been prohibitive to delivering a viable development.

Whilst the improvements of connectivity between Barrhead and Newton Mearns remains a Council aspiration and the Balgray Link Route retains the support of the Council it will not be pursued as an integral part of this site. It will remain within the Plan but the Council is seeking to amend the Action Programme to reflect that it will be a long term aspiration, the implementation of which will be sought from alternative funding sources. Development contributions will not be sought towards the cost of this proposal.

The education department have advised that for Barrhead South master plan improvements to the education estate required to mitigate pupil generation from the master plan area can be managed through the development contributions policy subject to the provision of pre-five facilities as an early priority. The master plan process and detail planning application will determine the development contributions required and timing for delivery of pre-five facilities.

The matters raised with regards to wildlife loss, amenity, air/soil, peat, water and loss of privacy / sunlight are matters of detail that are more appropriately addressed at the master plan stage and through the processing of detailed planning applications. Loss of property value is not a matter that can be considered in the Plan.

In order to provide recognition and clarity of the longer term nature of the Balgray Link Road and if the Reporter is so minded the Council would be supportive of the Action Programme being modified accordingly.

If the Reporter is so minded to recommend that the Representations from SEPA are accepted and the Plan modified to reflect the need for a Flood Risk Assessment, the Council would be supportive of this modification because it would not have any implications for the wider area or other policies within the LDP.

Policy M2.2

Add F: Flood Risk Assessment Required.

Scottish Natural Heritage (Ref 88/2), Scottish Natural Heritage (Ref 964/4)

The comments from SNH are welcomed as they highlight the balanced approach required to deliver the benefits to the Dams to Darnley Country Park that are urgently needed to realise its potential whilst highlighting the importance of the master plan approach. The Council is committed to progressing the detailed master plans in consultation with SNH in order to achieve this objective.

The council remains supportive of the opportunity to upgrades at Aurs Road. However, it is agreed that references to the former link road through the country park be removed. This was an earlier drafting error.

In order to correct this error and provide clarity if the Reporter was so minded to accept the representation the Council would be supportive of this modification.

Policy M2.2 Para 4.6.4 third bullet

Provision for a sustainable transport strategy comprising:

- Public Transport Upgrades;
- Provision of a new rail station at Springfield is investigated and land safeguarded;
- Upgrades to Aurs Road, ~~Barrhead to Crookfur Road/M77 link road;~~

Wallace Land Investment and Management (Ref 331/8), Persimmon Homes Ltd (Ref 743/12)

Schedule 11: Distribution, Capacity and Phasing of Additions to the Housing land Supply – Master Planned sites, provides capacity and phasing for each of the master plans. The Council maintains that Policy SG3: Phasing of New Housing Development and the plans strategy are in accordance with SPP and that a phasing policy remains a key component of the Plan. Policy SG3 identifies triggers to ensure a 5 year land supply is consistently provided. It is viewed that the strategic long term vision and the phasing of sites will assist with providing long term certainty for service providers and the development industry and will not restrict delivery of sites.

The Council cannot dictate build out rates or how the market may change over the period of the plan but this will be kept under review through the annual Housing Land Audit (CD/54) and Monitoring Statement (CD/08). This will ensure there remains a 5 year effective supply as required by SPP.

However, as demonstrated under Issue 9.1 the Council agrees with the representation and is seeking a minor modification to Schedule 11 to provide greater flexibility with the delivery of the master plans. If the Reporter is so minded Schedule 11 could be amended to state that the figures shown up to 2025 are minimum numbers. A detailed phasing plan will be included within the final SPG document.

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 approach. It is not viewed that this would have any implications for the Strategy of the Plan or other policies.

Schedule 11 of the Plan is modified as shown under Issue 9.1

Policy M2.2 Para 4.6.4 bullet point 2 be modified to state (additional text in italics):

Approximately 1060 homes to be phased 450 homes (*minimum*) by 2025 and 610 homes post 2025;

(b) POLICY D13.6: BARRHEAD SOUTH EXPANSION AREA – EDUCATION FACILITIES**SEPA (70/10)**

When viewed against SEPA Indicative Flood Risk Map, it is noted that only a small section of the master plan area falls within an identified flood area. However, as detailed above the Council confirms that a full flood risk assessment will be required across the master plan area prior to development proceeding.

(c) POLICY SG2.12: LYONCROSS, BARRHEAD**Support**

Mr and Mrs P Layden and Richard Layden (Ref 86/7) - The Council acknowledges and welcomes the support for Policy SG2.12.

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

Objections**SEPA (Ref 70/28)**

When viewed against SEPA Indicative Flood Risk Map, it is noted that this site does not fall within but lies in the vicinity of an identified flood area. However, as detailed above the Council confirms that a full flood risk assessment will be required across the master plan area prior to development proceeding.

Glasgow City Council (Ref 465/2), Stewart Milne Homes (Ref 500/6), D Jesner (Ref 783/5), Barrhead Community Council (Ref 924/6), Auchenback Tenants and residents Association (Ref 938/6, 938/7)

As detailed above the site at Lyoncross has been identified as suitable for release from the green belt subject to a master plan approach following the site evaluation assessment. All sites were assessed using this methodology and the Council is satisfied the scoring has been undertaken in a rational, fair and transparent manner. The effectiveness of the site has been established through the development framework.

The release will be informed by a series of studies and assessments to create a robust and long term development strategy for the site that will address the issues regarding impact on the park, appropriate green belt boundaries and extent of acceptable development area. A landscape visual impact assessment has identified the areas of Lyoncross that are visually sensitive and will not be considered for residential development. The development framework has demonstrated that sections of Lyoncross can be developed with limited impact on the amenity of the country park and its setting.

Development of appropriate sections of Lyoncross will provide direct access to the northern section of the Country Park which is currently severely limited. The inclusion of this site will bring direct and desirable access to the country park for existing residents of Barrhead and also visitors to the area with the provision of parking facilities either within the site and/or in a location that is accessed through the site. The topography and existing tree belts provide a strong defensible boundary that will be enhanced through the master plan process.

The development framework also identifies an access strategy that includes desirable footpath and vehicular access to the country park. This process along with the detailed assessments to be carried out will ensure that development is delivered in a manner that achieves the aims of Policy M2.2. Policy M2.2 seeks to enhance the country park by improving access, tourism activity and encouraging appropriate commercial and leisure activities. Similarly Policy D10: Environmental Projects continues support for Dams to Darnley Country Park.

The Council is confident that the master plan SPG will deliver a managed release that enhances the country park. Consultations with Glasgow City Council regarding the site and Dams to Darnley Country Park are ongoing.

Sites at Barrance Farm are addressed under Issue 9.2.5.

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

(d) POLICY SG2.13: SPRINGFIELD ROAD, SPRINGHILL ROAD, BARRHEAD**Objections****SEPA (Ref 70/29)**

When viewed against SEPA Indicative Flood Risk Map, it is noted that this site does not fall within but lies in the vicinity of an identified flood area. However, as detailed above the Council confirms that a full flood risk assessment will be required across the master plan area prior to development proceeding.

Stewart Milne Homes (Ref 500/9)

The effectiveness of the site has been established through the development framework detailed above.

Sites at Barrance Farm are addressed under Issue 9.2.5.

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

Edward Kelly (Ref 655/3)

This representation is addressed above under Rep 655/2.

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

(e) POLICY SG2.14: SPRINGFIELD ROAD, BALGRAYSTONE ROAD, BARRHEAD**Objections****SEPA (Ref 70/30)**

When viewed against SEPA Indicative Flood Risk Map, it is noted that this site does not fall within but lies in the vicinity of an identified flood area. However, as detailed above the Council confirms that a full flood risk assessment will be required across the master plan area prior to development proceeding.

Stewart Milne Homes (Ref 500/8)

The effectiveness of the site has been established through the development framework detailed above.

Sites at Barrance Farm are addressed under Issue 9.2.5.

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

Edward Kelly (Ref 655/1)

The owners wish for this site (as set out in the representation) to be removed from the plan is noted and accepted.

If the Reporter is so minded to recommend that the Representation is accepted and the Plan modified accordingly with this small parcel of land be deleted from SG2.14, the Council would be supportive of this approach as it would not have any implications for the wider master plan area or other policies within the Plan.

(f) POLICY SG2.15: SPRINGHILL ROAD, BARRHEAD**Support**

Miller Homes SW (Ref 77/1) - Support for inclusion of site noted and welcomed. Agreement to the master plan approach requirements and the commitment to joint working is noted and welcomed. Comments on the effectiveness of the site and development contributions levels are noted.

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

Objections

SEPA (Ref 70/31) - When viewed against SEPA Indicative Flood Risk Map, it is noted that this site does not fall within but lies in the vicinity of an identified flood area. However, as detailed above the Council confirms that a full flood risk assessment will be required across the master plan area prior to development proceeding.

Stewart Milne Homes (Ref 500/7)

The effectiveness of the site has been established through the development framework detailed above.

Sites at Barrance Farm are addressed under Issue 9.2.5.

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

(g) POLICY SG10.4 – SPRINGFIELD, BARRHEAD – New Rail Station**Objection**

SEPA (Ref 70/50) - When viewed against SEPA Indicative Flood Risk Map, it is noted that this site does not fall within but lies in the vicinity of an identified flood area. However, as detailed above the Council confirms that a full flood risk assessment will be required across the master plan area prior to development proceeding.

(h) MODIFICATION STAGE**Objection**

Liz Wilson (Ref 1319/1, 1319/2) - This representation sought inclusion of a parcel of land within the master plan. The proposal was for a low density housing scheme set within the existing woodland environment. This proposal has though not been previously considered at Main Issues Report or Proposed Plan stages.

This area of land is currently designated as protected urban greenspace under Policy D5 and is adjacent to a Local Biodiversity site. The site comprises existing woodland. It is not proposed to remove these existing designations.

The site also forms part of the green network within the area and offers bio-diversity value. The Council does not wish to see this green resource lost to inappropriate development.

However, inclusion of the site within the master plan could have wider benefits including

improving access routes between sites and also improving the green network opportunities of the master plan. The Council acknowledges the merits of including this site within the master plan and that a low density residential development would be appropriate and not a significant change to the area or wider Plan policies. However, any development would be subject to further environmental and design assessments being undertaken through the preparation of SPG that retains the woodland setting and green space resource. The Council is not seeking a change of the main land use designation on this site i.e. retain as Protected Urban Green Space.

If the Reporter is so minded to recommend that the Representation is accepted and the Plan modified, to include this minor addition to the master plan area the Council would be supportive of this modification because it would not have any implications for the LDP strategy or other policies within the Plan.

Site boundary (as shown by representation) is included within Policy M2.2.

Policies D4 and D5 to be retained over site.

SG2.7 residential proposal to be shown by way of symbol on the Proposals Map.

Schedule 10 of the Plan is modified as follows (modified text in italics):

Schedule 10: Distribution, Capacity and Phasing of Additions to the Housing land Supply

Site Ref	Location	HMA	Type	Notional Capacity #	Phase 1 Delivery by 2025 (Allocated land/Sites)		Phase 2 Delivery Post 2025 (safeguarded land/sites)	Notes
					2012-20	2020-25		
SG2.7	<u>Springfield House Barrhead</u>	LV	GF	8	8	0	0	<i><u>A low density residential development is supported. The site layout will be required to take account of the need to safeguard areas of important urban green space, the adjacent Local Biodiversity Site and the woodland to promote nature conservation. Policies D4 and D5 to be retained over site.</u></i>

Reporter's conclusions:The underlying principles of Policy M2.2: M77 Strategic Development Opportunity – Barrhead South – Springhill, Springfield, Lyoncross

1. The East Renfrewshire Local Plan allocates land to the south of Springfield Road, Barrhead, for residential development. Site H1.15, Springfield Road, extends to 15.25 hectares with a capacity of 280 houses, the allocation having been carried forward from the previous local plan. The eastern boundary of the site is formed by Aurs Road beyond which the land is shown to be within the Dams to Darnley Country Park. Part of the southern boundary of site H1.15 is formed by the Glasgow – Neilston railway line, beyond which is the Balgray Reservoir, also part of the Dams to Darnley Country Park. To the west of site H1.15 the land is designated green belt.
2. Policy M2.2 of the proposed plan identifies a strategic development opportunity over site H1.15 and land to both the east and west. This involves the removal of the extended area from the green belt. Development is to be taken forward through the preparation of a comprehensive master plan.
3. The proposed plan states that approximately 1050 houses are proposed of which 470 are phased for the period to 2025 and 580 post 2025. Other specified land uses include neighbourhood scale retail development, community/leisure facilities, including a potential site for a religious facility, and education provision. A sustainable transport strategy is proposed comprising public transport upgrades, a possible new railway station and improved local roads, including reference to the “Balgray Link” route. The Dams to Darnley Country Park is proposed for enhancement by improving access, tourist activity and the encouragement of commercial and leisure activities.
4. Objections to the principle of development relate to the removal of the land from the green belt, the consequential impact on landscape character and inadequate infrastructure. Various parties have expressed general concern about the scale of development and commensurate loss of rural character along with the need for the protection of the Dams to Darnley Country Park.
5. In terms of the loss of green belt, I consider that chapter 3 of the proposed plan provides a clear and succinct explanation of the rationale underlying the Development Strategy and Strategic Policies. It is important to note that, where possible, the plan seeks to direct development to brownfield or vacant sites in the urban area, with a continued emphasis on regeneration and consolidation of existing communities. The importance of the green belt is acknowledged with recognition that the release of any land from the green belt should be planned and should form part of the settlement strategy. A review of the green belt boundary has been undertaken to inform the preparation of the proposed plan and to meet the housing requirements of the Strategic Development Plan.
6. To meet the strategic requirements it has been necessary to identify new housing sites including land in the green belt. However, the proposed plan emphasises that the intended release accounts for only a 1.2 percent reduction in the current total area of the green belt.
7. Scottish Planning Policy requires strategic and local development plans to 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. I shall consider the

question of delivering development below but, in terms of the remaining requirements, I believe that the approach of the council has struck a reasonable balance between the need for growth and regeneration.

8. On the foregoing basis, taking into account the conclusions reached in respect of the examination of the strategic housing supply under Issue 9.1 and of the development strategy under Issue 2.1.2, I consider that, in principle, the case for proposing green belt release for residential and related development is well founded. Having also noted the arguments for providing a primary focus of growth in areas where development and delivery are controlled through a master planning, phasing and infrastructure requirement approach, I am satisfied that the concentration of development in three main areas, including Barrhead South, is justified.

9. Scottish Planning Policy sets out functions of green belt designation, one of which is to protect and enhance the character, landscape setting and identity of a settlement. In this case, the loss of an area of sensitive landscape character has been criticised as being detrimental to the setting of the Arthurlie area of Barrhead. I accept that the Barrhead South development zone would extend into an area of good quality landscape character providing a backdrop to the built up land to the north. On the other hand, as explained, the council has undertaken a green belt review and believes that the development would be well contained and the railway line to the south would constitute a firm, long term green belt boundary. I endorse this opinion.

10. To the east and west of the land allocated for development, the situation is less clear. To the east, the development area encroaches on the designated area of the Dams to Darnley Country Park whilst, to the west, the boundary of the green belt is less well defined. I shall consider these matters further when assessing the objections to the particular housing land allocations. I have also noted that the central section of the designated area is currently allocated for residential development in terms of the adopted local plan.

11. Insofar as deliverability is concerned, the land owners of the various housing land allocations are all supportive of the proposed development. Miller Homes are the owners of site SG2.15, Springfield Road, Wallace Land and Investment owns site SG2.13, Springfield Road, Springhill Road and East Renfrewshire Council owns site SG2.16, Springfield Road, Aurs Road. The owners of site SG2.12, Lyoncross, have also written in support of the terms of the proposed plan. I therefore conclude there is a general willingness to promote the development opportunity and, in turn, this meets the Scottish Planning Policy requirement for deliverable spatial strategies.

12. Overall, taking into account the balanced, two strand approach of the proposed plan, involving regeneration and controlled growth, I conclude that the principle of the land release at Barrhead is acceptable.

13. In reaching this conclusion I have noted references to a range of general concerns including loss of privacy and sunlight, impact on outlook, reduced property values, impact on health and well being, reduced quality of life and wildlife impacts. Some of these matters, such a property values, are not normally regarded as valid planning considerations and others have no substantive supporting evidence. Insofar as nature conservation is concerned, there are no formal protective designations. I have no reason to believe that as development moves forward, layout and design will not take account of the amenity of existing properties. In this respect, the development framework prepared

by the council recognises that a number of residential properties are already located within the site.

14. Concern has been expressed about the disruptive nature of live-work units in residential areas but this concept is supported in Scottish Planning Policy and may well have a place within the wider project. Clearly, residential amenity must be taken into account in the location of development of this nature.

15. Although I appreciate that the implementation of the development will lead to a very significant change in the character of the area this does not lead me to conclude that the proposed plan should be modified.

Infrastructure considerations

16. Various aspects of infrastructure provision have been questioned. These include local roads and wider network connections, education, water supply and drainage.

17. I note the council has adopted a staged approach to the implementation of the South Barrhead development opportunity. In addition to the proposed plan, which when adopted will become the statutory development plan, the council has, as indicated above, prepared and approved a development framework. This framework considers the central aspects of the proposed development including infrastructure.

18. In terms of the existing road network, the framework recognises the shortcomings of Springhill Road and Springfield Road including restricted carriageway width, lack of footways and street lighting and the bridge over the Aurs Burn. The junction between the two roads is acknowledged as being substandard. These problems must be resolved in the event of development progressing and the framework indicates that more detail would be provided at the next stage which involves the preparation of the master plan. I am confident that it would be possible to devise a safe local road layout that would meet the required design standards and accommodate the level of traffic generated by the development. The framework also explains how the proposed development would link into the local road network and it is clear that this aspect of the development has been given some considerable attention.

19. It has been pointed out that the reference in Policy M2.2 to the “Upgrades to Aurs Road, Barrhead ...” is inaccurate. The council has suggested a modification to the third bullet point to clarify this matter. I agree with this proposed modification and, in addition, consider that the final part of the bullet point should also be modified to reflect the council’s position on the “Balgray Link”. Although it has been suggested that the development relies on the Balgray Link Road, the council has explained that this is not the case and the development is able to proceed irrespective of the link road. This is explained in more detail under Issue 3.2 where, at the council’s suggestion, it is recommended that the proposed plan is modified to explain the situation.

20. Access by public transport has been assessed with the majority of the site being within 400 metres of a bus stop. Provision has been made for a new railway station and access by pedestrians and cyclists has also been considered.

21. Insofar as drainage is concerned, the Scottish Environment Protection Agency has indicated a need for a flood risk assessment for the various development proposals within the Barrhead South area. The development framework believes it unlikely that there

would be any flooding constraints although I note the Scottish Environment Protection Agency Flood Map shows some limited areas within the area of a 1:200 year Surface Water Event along with a 1:200 year Fluvial Event along the Aurs Burn. Overall, flood risk appears to be limited but the council would be content to include a requirement within Policy M2.2 that a flood risk assessment should be undertaken. I agree this would be appropriate.

22. Despite the concerns expressed about educational capacity, the development framework indicates that only the provision of a pre-five facility is required as an early priority. Capacity within other schools can be managed subject to appropriate development contributions. The education department has confirmed the situation. I note an allocation for a pre-five facility has been included in the proposals map under reference D13.6 and that Policy M2.2 confirms both this and the provision of development contributions. On this basis I conclude that the council has adequately considered the need for education infrastructure and this is reflected in the proposed plan.

23. Reference has been made to poor water pressure but the development framework does not specify any particular problems in respect of future water supply. Nevertheless, it is recognised that a water impact assessment will be required. I note also that Scottish Water supports Policy M2.2. Indeed, Scottish Water confirms funding to provide upgrades at treatment works and points out that lack of capacity should not be seen as a barrier to development. As a consequence, I conclude that an adequate water supply is capable of being provided.

24. Overall, I am satisfied that the council has addressed infrastructure provision at a level appropriate for this stage of the project and that the proposed plan does not require modification in respect of those particular matters that have been raised in representations.

Site SG2.12, Lyoncross

25. Lyoncross is the most easterly section of Barrhead South and covers land that is part of the Dams to Darnley Country Park. The development framework indicates that the location raises the sensitivity of the landscape and visual resource and I agree this to be the case. I also accept that the development of the site could provide improved access to the northern part of the country park. Careful design, says the framework, could improve the interface between the urban area of Barrhead and the rural country park by providing a softer transition. In my opinion this objective, albeit challenging, could be achieved. Taking into account local landscape character, the framework suggests limited built development in the eastern part of the site. Similarly, in the sloping section to the north, restricted development would avoid the need for major earthworks and reduce visual impact. I note the design principles set out in the development framework show a limited amount of residential development within the Lyoncross site with significant areas of public open space and retention of existing trees.

26. I have previously considered the loss of green belt as a consequence of the development of Barrhead South but I concluded that the development opportunity should be supported. Having taken account of the design and layout objectives at Lyoncross I consider the revised green belt boundary at this location to be acceptable.

27. In addition to green belt considerations, the encroachment of the Lyoncross site into the Dams to Darnley Country Park is also seen by some to be a further unacceptable

intrusion. I can appreciate this concern. However, I believe that the landscape character of the area has been carefully analysed and a design concept brought forward that should provide the required residential development whilst, at the same time, respecting and potentially enhancing access to the country park. I therefore conclude that the terms of the proposed plan should remain without modification. The continued designation of Lyoncross within the country park provides an ongoing indication of the value of this site in the context of the park.

Site SG2.13, Springfield Road, Springhill Road

28. Although Steward Milne Homes considers this site should be deleted for a variety of reasons, I accept the council's opinion that the effectiveness of the site has been established through the development framework. Having accepted the concept of allocating the Barrhead South development opportunity, I do not consider the cumulative impact of this site within the wider allocated area to be unacceptable. The definition of the proposed green belt boundary at this point is clearly not as robust as the boundary formed by the railway line to the south. Nevertheless, I am prepared to accept that Springhill Road, especially, and Springfield Road provide a reasonable boundary and provide scope for reinforcement through the layout and design of the residential development at this location. The development framework recognises the visually sensitive nature of the area to the south-west of the site and indicates that development on the land between Springfield Road and Springhill Road will be limited. I believe this to be the correct approach.

29. The various technical and design considerations raised are capable of being addressed during the course of the development process.

30. As explained above, reference to a general requirement for flood risk assessment throughout the M2.2 area will be included in the proposed plan to reflect the requirements of the Scottish Environment Protection Agency.

Site SG2.14, Springfield Road, Balgraystone Road

31. The concerns expressed by Stewart Milne Homes do not raise any issues that have not previously been assessed. Accordingly, modification of the proposed plan is not justified.

32. Edward Kelly of Springfield House has objected in general terms to Policy M2.2 but I have not recommended any modifications in this wider respect. However, the council is prepared to modify the proposed plan to the extent of removing an area of land adjoining Springfield Road from the allocated area of site SG2.14. Although the land has not been clearly identified, it is said to be within the title of Springfield House which is itself excluded from site SG2.14. The deletion of this additional area therefore is acceptable and, in this respect and if necessary, the council should agree the precise boundary with Mr Kelly prior to effecting the modification. I do not consider that the removal of this small parcel of land would significantly impact on the overall housing supply figures for the master plan area.

Site SG2.15, Springhill Road

33. As in the previous cases the concerns expressed by Stewart Milne Homes are not regarded as a cause to modify the proposed plan. The general principle of development

has been found to be justified and whilst this leads to a loss of green belt, the new boundary is acceptable. There is no reason to doubt the effectiveness of the site and the development framework approach will ensure a co-ordinated programme of house-building and infrastructure provision throughout the expansion area.

Policy SG10.4, New Railway Station

34. Clearly, the early provision of a new station would widen the scope of public transport modes but I accept that the phasing would be more appropriately considered through the master plan. The Scottish Environment Protection Agency requirement for a flood risk assessment is satisfied through the policy-wide modification previously discussed.

Policy D13.5, Community/leisure facilities (including allotments and potential site for a religious facility)

35. Despite the apparent lack of interest in a religious facility, I agree with the council that it is appropriate to retain the potential for such a facility in order that, if necessary, a site could be made available. This would contribute towards a balanced community.

Retail provision

36. Whilst a quantified retail floorspace has been requested, I believe that the indication that “neighbourhood scale” is a reasonable indication of the level of provision the council anticipates. I therefore accept that the proposed plan should be required to be no more specific and that further details will evolve as the master plan process progresses.

Policy D4, Green Network, and D5, Protection of Urban Greenspace – land at Springfield Bridge

37. I agree that this green resource should be retained but I am doubtful whether the proposals suggested by Ms Wilson would achieve this objective. The woodland over this area has become quite well established and is now a strong feature in the landscape. Indeed, it could well be that the area has matured significantly since the mid 1990s when Ms Wilson explains that planning permission was granted on appeal for live-work units. In terms of the current circumstances I believe that even a limited development would have an inevitable and significant adverse impact on this important area of green space within the wider master plan area. Improving access routes between the sites would not justify this adverse impact and there is no need for the additional housing supply. Consequently, despite the support of the council for the proposed modification, I consider that the plan should remain as proposed. The land in question should therefore be excluded from the master plan area and be subject to Policies D4 and D5.

Residential Phasing

38. Concerns over phasing are considered under Issue 9.1, Housing Supply, where it is concluded that the approach of the proposed plan towards phasing is adequate and reflects the provisions of Scottish Planning Policy. The basis for this conclusion is the level of provision of housing land and the flexibility contained in Policy SG3 in order to maintain a 5 year land supply. On this basis, I am also unable to accept the modification suggested by the council in respect of Schedule 11.

Reporter's recommendations:

I recommend that the following modifications be made:

1. In Policy M2.2, paragraph 4.6.4, third bullet point, replace sub-bullet point 3 as follows;

“Upgrades to Aurs Road”

Note: under Issue 3.2, the following modification to sub-bullet point 4 is recommended:

“Investigate improvements to connectivity between Barrhead and Newton Mearns including, in the long term, the ‘Balgray Link’ route.”

2. In Schedule 11, in the row “M2.2, Barrhead South SDO” insert in the “Notes” column, “****” and add to the note field for Schedules 10 and 11: “**** flood risk assessments required throughout the areas of Malletsheugh/Maidenhill, Newton Mearns SDO and Barrhead South SDO” (see also Issue 3.3)

3. In Proposals Map 3, exclude land in the ownership of Mr Edward Kelly, Springfield House, from the land allocated for residential development, the precise boundary to be determined by the council in liaison with Mr Kelly.

Issue 3.5	SHANKS/GLASGOW ROAD BARRHEAD	
Development plan reference:	Policy M3: Strategic Development Opportunity - Shanks/Glasgow Road Barrhead	Reporter: Richard Dent
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>SEPA (Ref 70/32) (Ref 70/33) (Ref 70/35) (Ref 70/40) Cruden Estates (Ref 248/2) Co-operative Group (Ref 254/3) Scottish Water (Ref 256/4) Education Department, East Renfrewshire Council (Ref 275/6) Bunzl plc (Ref 402/1) (Ref 402/2) (Ref 402/3) Andrew Gray (Ref 501/5) Julie Cameron (Ref 507/2) Nazir Ahmed (Ref 755/5) Barrhead Community Council (Ref 924/3) (Ref 924/9) Auchenback Tenants and Residents Association (Ref 938/3) (Ref 938/4) Scottish Natural Heritage (Ref 964/6)</p>		
Provision of the development plan to which the issue relates:	<p>Chapter 4: Key Areas for Change and Settlement Strategies Para. 4.7 – 4.8.2 –Strategic Development Opportunity - Shanks/Glasgow Road Barrhead Figure 8: Policy M3 – Shanks/Glasgow Road Policy SG1: Housing Supply Policy SG6.5 Grahamston Road/ Blackbyres Road, Barrhead Policy SG2.17 Shanks Park, Barrhead Policy SG2.19 North Darnley Road, Barrhead Policy SG6.3 Glasgow Road East, Barrhead Policy SG6.17 Glasgow Road East, Barrhead Schedule 10: Distribution, Capacity and Phasing of Additions to the Housing land Supply</p>	
Planning authority’s summary of the representation(s):		
<p><u>(a) Policy M3: Shanks/Glasgow Road Barrhead</u></p> <p><u>General</u></p> <p><u>Scottish Natural Heritage (Ref 964/6)</u> - SNH has no specific concerns with this particular Master Plan area or the assessment of its environmental effects, and notes that the assessment appears to be considerably more coherent than that which was presented at MIR stage.</p> <p><u>Support</u></p> <p><u>Cruden Estates (Ref 248/2)</u> Support identification of site as Strategic Development Opportunity enables development of this site. Keen to take forward the development at the earliest opportunity.</p>		

Screening option has been received.
 Planning application envisaged in next 18 months.

Scottish Water (Ref 256/4) - Support and will work closely with Local Authority and participate in the masterplan process.

Andrew Gray (Ref 501/5) - Support regeneration of Barrhead

Nazir Ahmed (Ref 755/5) - Support development but do not support site for allocation of Muslim religious facility (D13.5)

Barrhead Community Council (Ref 924/3), Auchenback Tenants and Residents Association (Ref 938/3) - Welcome progress towards redevelopment of Shanks Park

Objections

Co-operative Group (Ref 254/3) - Danger policy could inadvertently support out of centre retail without clarity, policy should define what use classes would be acceptable.

Education Department, East Renfrewshire Council (Ref 275/6) - Shanks SDO requires community and leisure facilities to be addressed. New pre-five provision may be required depending on phasing housing mix and other factors.

Julie Cameron (Ref 507/2)

Schools have not been considered and schools at capacity presently (in relation to new housing proposed)

No mention of upgrading Barrhead High or Cross Arthurlie , no mention of St Marks School upgrading should be a priority

What school would children go to if Shanks is developed

(b) Policy SG6.5 Grahamston Road/ Blackbyres Road, Barrhead, Policy M3: Shanks/Glasgow Road Barrhead, Policy SG1: Housing Supply - LDP53 Grahamston Road and Blackbyres Road

Objection

Bunzl plc (Ref 402/1) (Ref 402/2) (Ref 402/3)

Site 3.79 ha and Brownfield

Site previous use with railway lines removed 1960s, site not in use since

Site is in single ownership and should be stand alone site

Site is an important gateway and development would enhance the appearance of urban edge

Object to allocation of area of land bound by Grahamston Road and Blackbyres Road as area for Economic Development

Site has frontage to roads and is capable of being developed in its own right

Access can be provided, Grahamston Road

No reference is made within policy M3 to the site and it is not physically connected to Shanks site or Glasgow Road land

There is no planning need to tie sites future development to that of Shanks

Vision for site is a mixed-use development with live/work focus

Important gateway site, development would greatly enhance appearance

Unlikely to be developed if solely allocated for economic use, derelict land is detrimental

to economic growth - Opportunity to kick start stalled employment area
LDP states new approaches to economic development in para 6.10, Bunzl supports this move away from narrow use classes

Wish to develop site a mix of live/work units, Class 4 units for small and medium sized enterprises (SMEs), open market housing and a "pocket park"

Small businesses operating from the live/work work units which out-grow the "work" floorspace part of the live/work units would be able to move within the site to the Class 4 units.

Number of jobs from live work and class 4 could exceed those created by classes 5 and 6
Live/work units typically built on non-housing sites and are more than just units to facilitate home working and can form business communities in their own right.

Site vision is for live/work units, class 4 units 500sqm, open market housing 50-70 units (20% live work) and a pocket park

Enabling housing development can be a factor

Greater positive enterprise effect than traditional employment models

In England land is considered employment land/housing hybrid - own use class or can be allocated as employment

Reduced/nil business rates to some occupiers

Would mean reduced out commuting - a particular issue in ER

Meets particular demands in area for private offices and workspace

Would draw on and support existing town centre hub (Barrhead Steps) in Barrhead

(c) Policy SG2.17 Shanks Park, Barrhead

Objection

SEPA (Ref 70/32) - Assessment of flood risk required.

(d) Policy SG2.19 North Darnley Road, Barrhead

Objection

SEPA (Ref 70/33) - Assessment of flood risk required.

(e) Policy SG6.3 Glasgow Road East, Barrhead Policy SG6.17 Glasgow Road East, Barrhead (Policy M3)

Support

Barrhead Community Council (Ref 924/9) - SG10.7, SG6.17 and SG6.3 will guide business towards Glasgow Road Corridor, retain employment in town and ensure redevelopment of Nestle

Auchenback Tenants and Residents Association (Ref 938/4) - SG10.7, SG6.17 and SG6.3 will guide business towards Glasgow Road Corridor, retain employment in town and ensure redevelopment of Nestle

Objection

SEPA (Ref 70/35) (Ref 70/40) - Assessment of flood risk required.

Modifications sought by those submitting representations:**(a) POLICY M3: SHANKS/GLASGOW ROAD BARRHEAD**

Co-operative Group (Ref 254/3) - Policy should define what use classes would be acceptable.

Education Department, East Renfrewshire Council (Ref 275/6)

Shanks SDO requires community and leisure facilities to be addressed.
New pre-five provision may be required depending on phasing housing mix and other factors.

Julie Cameron (Ref 507/2) - School upgrading should be a priority

(b) POLICY M3: SHANKS/GLASGOW ROAD, BARRHEAD, POLICY SG6.5: GRAHAMSTON ROAD/BLACKBYRES ROAD, BARRHEAD AND POLICY SG1: HOUSING SUPPLY - LDP53 GRAHAMSTON ROAD AND BLACKBYRES ROAD**Bunzl plc (Ref 402/3)**

Identify site as suitable for mixed use development opportunity.
Mix of live/work units, Class 4 units for small and medium sized enterprises (SMEs), open market housing and a “pocket park”
Remove area of land bounded by Grahamston Road and Blackbyres Road from M3 area and designate as a standalone site for mixed-use live/work.

(c) Policy SG2.17 Shanks Park, Barrhead

SEPA (Ref 70/32) - Flood Risk Assessment required.

(d) Policy SG2.19 North Darnley Road, Barrhead

SEPA (Ref 70/33) - Flood Risk Assessment required.

(e) Policy SG6.3 Glasgow Road East, Barrhead Policy SG6.17 Glasgow Road East, Barrhead (Policy M3)

SEPA (Ref 70/35) (Ref 70/40) - Flood Risk Assessment required.

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

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council’s approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

Policy M3 is critical to the delivery of the Council’s long term vision and development strategy for East Renfrewshire. To ensure the development is carried out in a manner that

delivers the Council's vision and delivers development in a sustainable way, the Plan makes it clear that the site will be master planned. The first stage of this process is the preparation of a Development Framework (CD/22). This document was approved by East Renfrewshire Council at its meeting of 29th January 2014.

The master plan will be adopted by the Council as Supplementary Planning Guidance. Justification for the master plan process is set out further under Issue 3.1.

The M3 policy area comprises land at Glasgow Road, Shanks and Grahamston/Blackbyres Road 'Bunzl'. The Development framework brings together these former industrials areas with the aim of bringing them back into viable use and the recognition of the strong desire to see these unused and problematic areas transformed. The development of this master plan is an essential element of the future growth of Barrhead and will compliment the regeneration of the town and future growth within the master plan area at Barrhead South. It will provide an effective employment and residential land supply for many years in a planned and controlled manner and will stimulate growth within the town creating a desirable place to live and work. The Council has a clear strategy to deliver enable the delivery of the sites whilst recognising that financial viability will be critical to development.

(a) POLICY M3: SHANKS/GLASGOW ROAD, BARRHEAD

General

Scottish Natural Heritage (Ref 964/6) - The comments from SNH are noted and welcomed.

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

Support

Cruden Estates (Ref 248/2), Scottish Water (Ref 256/4), Andrew Gray (Ref 501/5), Nazir Ahmed (Ref 755/5), Barrhead Community Council (Ref 924/3), Auchenback Tenants and Residents Association (Ref 938/3)

The Council acknowledges and welcomes the support for Policy M3 and the partnership approach to prepare the master plan. Support of regeneration of Barrhead is noted and welcomed.

The reference to religious facilities are not applicable to this site. The reference to D13.5 is applicable to the Barrhead South master plan area (M2.2).

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

Objections

Co-Operative Group (Ref 254/3) - Policy M3 supports employment generating uses to the East of Glasgow Road. The Development framework shows that Neighbourhood scale retail is to be supported at the Glasgow Road section of the larger master plan area. The scale of retail will be controlled through the master plan and through Policy SG7: Town and Neighbourhood Centre Uses.

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

Education Department, East Renfrewshire Council (Ref 275/6), Julie Cameron (Ref 507/2)

The community infrastructure requirements will be investigated and addressed through the development of the master plan. The education department have advised that improvements to the education estate required to mitigate pupil generation from the development can be managed through contributions achieved through the development contributions policy subject to the pre-five provision being considered.

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

(b) POLICY M3: SHANKS/GLASGOW ROAD, BARRHEAD, POLICY SG6.5: GRAHAMSTON ROAD/BLACKBYRES ROAD, BARRHEAD AND POLICY SG1: HOUSING SUPPLY - LDP53 GRAHAMSTON ROAD AND BLACKBYRES ROAD**Objections****Bunzl plc (Ref 402/1, 402/2, 402/3)**

The site is currently allocated for Economic Development. The long term failure of this site to deliver business/industrial uses on its own has been recognised by the Council. This northern area of Barrhead has suffered from significant areas of ineffective Brownfield land of which this site is one. In considering this area as a whole the Council has sought to stimulate development and economic growth by rationalising business and vacant land and delivering required infrastructure improvements through a master plan approach. The master plan area has to make provision for a sustainable linked transport strategy which would include improved connections to the surrounding road network. The site is located at a significant road junction that will provide one of these connections and the Council considers that the inclusion of the site within the master plan serves a planning purpose to ensure the shared delivery of this junction and any improvements if required.

Policy SG6: Economic Development advocates a flexible approach to sustainable economic growth which removes restrictions on use class. The Council considers that this flexible approach is in accordance with SPP and addresses the issues raised by the representation. Positive discussions have been held with the land owner's representative. The site is included within the M3 master plan with the intention that the common infrastructure could be addressed across the whole master plan area and individual master plans for the separate sites prepared.

No objections have been received to the principle of development of this site at either MIR or Proposed Plan stages.

To assist with delivery of the site the Council sees merit in the representation that a limited enabling housing release would be acceptable in the interests of achieving employment development, remediation and other required infrastructure, economic and environmental improvements. Policy SG6 also provides the flexibility to allow a residential proposal if fully justified against criteria. Limited residential development will not impact upon the overall supply of employment land across the Authority. The master plan for this site provides the opportunity to finalise housing numbers, however, it is essential that the main use of the site is retained for employment use as identified in the Proposed Plan. In addition housing secured on this Brownfield site will offset the potential deletion of Site SG1.5 Fereneze Barrhead (Issue 9.1.1 refers) if the Reporter is

so minded.

If the Reporter is so minded to recommend that the Representation is accepted and the Reporter agrees the site is a suitable mixed use employment/residential opportunity, the Council would be supportive of this modification because it would not have any significant implications for the wider area or other policies within the LDP. Additionally it would assist with delivering the aims and objectives of the LDP Strategy and master plan.

Insert new bullet point after bullet point one to read:

- Grahamston Road/Blackbyres Road:Redevelopment for employment use with limited enabling residential development of approximately 35 units

Schedule 10 of the Plan is modified as follows (modified text in italics):

Schedule 10: Distribution, Capacity and Phasing of Additions to the Housing land Supply

Site Ref	Location	HM A	Type	Notional Capacity #	Phase 1 Delivery by 2025 (Allocated land / Sites)		Phase 2 Delivery Post 2025 (safeguarded land / sites)	Notes
					2012-20	2020-25		
SG2.8	<u>Grahamston Road / Blackbyres Road, Barrhead</u>	<i>LV</i>	<i>BF</i>	35	35	0	0	<i>Enabling residential development</i>

SG2.8 residential proposal to be shown by way of symbol on the Proposals Map.

A notes field is added below Schedules 12 and 13 and an asterisk added to Policy SG6.5 and SG6.16 as follows:

* enabling residential development.

(c) POLICY SG2.17: SHANKS PARK, BARRHEAD

Objection

SEPA (Ref 70/32)

SEPA raised concerns that an assessment of flood risk would be required. However, the site does not fall within SEPAs 1:200 flood maps. The requirement for assessment of flood risk will be undertaken through the master plan process. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals. The comments of SEPA will be taken fully into account in the decision-making process.

If the Reporter is so minded to recommend that the Representation from SEPA is accepted and the Plan modified to reflect the need for a Flood Risk Assessment, the Council would be supportive of this modification because it would not have any implications for the wider area or other policies within the LDP.

Policy M3

Add F: Flood Risk Assessment Required.

(d) POLICY SG2.19: NORTH DARNLEY ROAD, BARRHEAD

Objection

SEPA (Ref 70/33)

SEPA raised concerns that an assessment of flood risk would be required. However, the site does not fall within SEPAs 1:200 flood maps. An area of flood risk is located adjacent to the site. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals.

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

(e) POLICY SG6.3: GLASGOW ROAD EAST, BARRHEAD, POLICY SG6.17: GLASGOW ROAD EAST, BARRHEAD (POLICY M3)

Support

Auchenback Tenants and residents Association (Ref 938/4) Barrhead Community Council (Ref 924/9)

Support for promoting these sites for economic development is noted and welcomed.

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

Objection

SEPA (Ref 70/40) (Ref 70/40)

SEPA raised concerns that an assessment of flood risk would be required. However, only the eastern section of the site falls where it follows the burn is within a flood area. Development will be directed away from this area. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals. The comments of SEPA will be taken fully into account in the decision-making process.

If the Reporter is so minded to recommend that the Representation from SEPA is accepted and the Plan modified to reflect the need for a Flood Risk Assessment, the Council would be supportive of this modification because it would not have any implications for the wider area or other policies within the LDP.

A notes field is added below Schedules 12 and 13 and an asterix added to Policy SG6.5 and SG6.16 as follows:

Add F: Flood Risk Assessment Required.

Reporter's conclusions:(a) Policy M3: Shanks/Glasgow Road, Barrhead

1. Two general concerns have been expressed in respect of the wider concept of the master plan approach under Policy M3.
2. Firstly, I can understand that this location may have attractions for some retailers but, nevertheless, a range of controls exists to ensure that development is of an appropriate type and scale. The council draws particular attention to the master plan in this respect. This document will carry some considerable weight for, as Policy M3 indicates, the master plan will be adopted by the council as supplementary guidance. The council also makes reference to Policy SG7 which provides a focus on the existing town and neighbourhood centres listed in Schedule 14. Policy SG7 provides further development management guidance in respect of a sequential approach for site selection along with a requirement for any proposal to be of a scale commensurate with the size of the local community. Scottish Planning Policy is clear in demonstrating that out-of-centre locations are fourth in the list of four categories in the order of preference for new retail development. Additionally, I note that the Glasgow Road vicinity is not listed in Schedule 15, New Shopping Development.
3. On the basis of the foregoing, I believe the reference to concentrating "employment generating uses" to the east of Glasgow Road to be reasonable. There are adequate mechanisms for imposing the required control over unacceptable uses, including retail use other than of a neighbourhood scale. Accordingly, I conclude there is not a requirement to specify the classes of development which would be acceptable.
4. Secondly, when embarking on significant residential development, it is clearly necessary to be confident that appropriate infrastructure, including education infrastructure, will be available, or can be made available, to meet the increased demand. Although Ms Cameron has expressed concern in this respect, the council's Education Department believes that any required improvements to education infrastructure can be secured through development contributions. This opinion carries considerable weight, particularly as I have been provided with no compelling evidence to indicate that education infrastructure would present insurmountable constraints to development. On this basis, I am satisfied that the master plan preparation process will provide the opportunity to explore any infrastructure implications and offer solutions for any identified shortfalls. In turn, I conclude that education infrastructure does not constitute a reason for restraining the development aspirations contained in Policy M3.
5. I have also noted the reference to a Muslim religious facility but, as the council points out, no such facility is proposed within the area of Policy M3 and, as a consequence, there is no requirement to further examine this concern.

(b) Policy SG6.5: Grahamston Road, Blackbyres Road, and Policy SG1: Housing Supply – LDP53, Grahamston Road and Blackbyres Road

6. Bunzl plc argues that this particular site is capable of development in its own right and should therefore be excluded from the master plan area of Policy M3. On the other hand, the council believes the master plan approach is necessary to secure a sustainable linked transport strategy by providing good connections with the surrounding road network. In this respect, states the council, the site is located at a significant road junction and the

master plan would ensure that the role of the junction, along with any required improvements, would be to the benefit of all those within the area of Policy M3.

7. I note that Policy M3 indicates that planning applications will not be considered favourably prior to the adoption of the master plan to ensure a co-ordinated approach to delivery. Although a development framework has been approved, any subsequent delay in agreeing the content of the master plan may therefore prevent the implementation of development within the Policy SG6.5 site. This would be unfortunate as it does appear to me, as claimed by the owner, that development could proceed in its own right.

8. As explained, the reason the council has advanced for retaining the site within the master plan area is to ensure appropriate links can be provided to the wider road network. In particular, I note the development framework indicates the possibility of improvements at the junction of Blackbyres Road and Grahamston Road. It appears to me that this requirement, which I accept to be important, could be incorporated into the development proposed for the Policy SG6.5 land. In its simplest form, this would involve the safeguarding of land likely to be required for any improvements. Should proposals threaten the wider access arrangements for the remainder of the master plan area, control could be applied through the development management process. I therefore believe that the potential for the possible early development of site SG6.5 should be encouraged. Indeed, the location of the site is such that development may act as a stimulus to further progress within the wider master plan area.

9. Despite the foregoing, I appreciate the value of the master plan approach, and the benefits that can be derived from a co-ordinated approach, for instance, as has been argued, in terms of improved connections to the wider road network.

10. On the foregoing basis, I conclude that, on balance, the site should not be removed from the provisions of Policy M3. However, it would be appropriate to indicate that the earlier development of site SG6.5 would be acceptable despite the embargo imposed until the master plan is adopted subject to there being no prejudice to connections to the surrounding road network. The terms of the development framework and, hopefully, the emerging master plan should allow the required judgement to be made on the adequacy of any proposed development.

11. Regarding the future use of the site, Scottish Planning Policy requires local development plans to allocate a range of sites for business, taking account of current market demand. Where existing sites are underused, one suggested course of action is to consider alternative uses. Opportunities for live-work units, as proposed by Bunzl, are to be supported. The guidance therefore provides support for the use of the land envisaged by Messrs Bunzl.

12. Having concluded that the site should remain within the area of the master plan, I also agree that a further bullet point should be added to Policy M3 in respect of the Grahamston Road/Blackbyres Road site. This should include a reference to limited residential development and I believe it would be appropriate to identify the possibility of providing live-work units. I consider that the potential loss of some employment land is justified in this instance because i) there is a generous allocation both throughout the plan area and in Barrhead, ii) this site has not been identified by the council as a "quality" employment site in the East Renfrewshire context, iii) limited residential development could act as a stimulus in the light of many years of inactivity over the site, iv) the potential provision of live-work units would in any event provide employment opportunities

and, v) as the council states, limited residential development would compensate for the loss of housing land nearby. As indicated previously, the policy note should also explain that, as an exception to the general master plan approach, early development of the site would be acceptable subject to the council being satisfied that there would be no prejudice to links with the wider road network.

13. The development situation would be explained through the extra bullet point in Policy M3, and, therefore, I consider that sites SG6.5 and SG6.16 should be retained in Schedules 12 and 13 respectively. As proposed by the council, there should be notes to indicate that an element of residential development would be acceptable. The new housing should not be included in Schedule 10 under SG2.8, as suggested by the council, but should be an addition to Schedule 11 which deals with additions to the housing land supply in master planned sites.

(c) Policy SG2.17: Shanks Park, Barrhead

14. I note the Scottish Environment Protection Agency Flood Map indicates that significant parts of the site are within the 1:200 year Surface Water Extent. In view of the extent of surface water impact shown on the Flood Map, I agree that it would be appropriate to specify the need for a flood risk assessment in the proposed plan.

(d) Policy SG2.19: North Darnley Road, Barrhead

15. I note the Scottish Environment Protection Agency Flood Map indicates that only a very small part of the site could be within the 1:200 year Fluvial Extent (the scale makes accurate assessment difficult). I conclude it would be unlikely that development would be subject to a substantial flood threat. On this basis I agree with the council that Policy E3, Water Environment, Policy E4, Flooding, and Policy E5, Surface Water Drainage, would adequately address the water environment requirements of all development proposals in this area. In turn, there is no requirement to modify the proposed plan.

(e) Policy SG6.3: Glasgow Road East, Barrhead & Policy SG6.17: Glasgow Road East, Barrhead

16. I note the Scottish Environment Protection Agency Flood Map indicates that parts of the eastern and northern sections of the site are within the 1:200 year Surface Water Extent. In view of the extent of surface water impact shown on the Flood Map, I agree that it would be appropriate to specify the need for a flood risk assessment in the proposed plan.

Reporter's recommendations:

I recommend that the following modifications be made:

1. In Policy M3: Strategic Development Opportunity – Shanks/Glasgow Road, Barrhead, insert a further bullet point in paragraph 4.8.2. as follows:

- Grahamston Road/Blackbyres Road:
Redevelopment for employment use with limited enabling residential development of approximately 35 units. The residential development offers potential for “live-work” units. Exceptionally, development in this area will be permitted to progress prior to the adoption of the master plan subject to there being no prejudice to

providing improved connections to the surrounding road network.

2. In Schedule 11, under **M3, Shanks/Glasgow Road, Barrhead**, insert a further site as follows:

Schedule 11: Distribution, Capacity and Phasing of Additions to the Housing land Supply

Site Ref	Location	HMA	Type	Notional Capacity #	Phase 1 Delivery by 2025 (Allocated land/sites)		Phase 2 Delivery Post 2025 (safe guarded land/sites)	Notes
					2012-20	2020-25		
SG 2.20	<u>Grahamston Road/Blackbyres Road, Barrhead</u>	LV	BF	35	35	0	0	<i>Enabling residential development (potential for live-work units)</i>

3. On Proposals Map 2, Levern Valley, annotate the Grahamston Road/Blackbyres Road site with “SG2.20” in addition to the existing “SG6.5” and “SG6.16”.

4. In Schedules 12 and 13, apply an “***” to, respectively, Policy SG6.5 and Policy SG6.16 and, below both Schedules insert a note field as follows:

“*** enabling residential development (potential for live-work units)”

5. In Schedule 11, under SG2.17, after “*Shanks Park, Barrhead*”, insert “and *****”

6. In the notes at the foot of Schedules 10 and 11, insert “***** Development proposals will require to be subject to a flood risk assessment”.

7. In Schedule 12, under SG6.3, after “Glasgow Road East, Barrhead”, insert “**”

8. Insert at the foot of Schedule 12 “* Development proposals will require to be subject to a flood risk assessment”.

9. In Schedule 13, under SG6.17, after “Glasgow Road East, Barrhead”, insert “**”

10. Insert at the foot of Schedule 13 “* Development proposals will require to be subject to a flood risk assessment”.

Issue 3.6	MASTER PLAN BRAIDBAR QUARRY	
Development plan reference:	Policy M4: Braidbar Quarry	Reporter: Richard Dent
Body or person(s) submitting a representation raising the issue (including reference number):		
Barry Gladstone (Ref 1/1) Scottish Water (Ref 256/5) Trustees of The Glasgow Jewish Community Trust (Ref 681/1) Sport Scotland (Ref 702/5) Nazir Ahmed (Ref 755/4) Scottish Natural Heritage (Ref 964/1)		
Provision of the development plan to which the issue relates:	Chapter 4: Key Areas for Change and Settlement Strategies Para. 4.9 – 4.10.1 – Braidbar Quarry Figure 9: Policy M4 Braidbar Quarry	
Planning authority’s summary of the representation(s):		
<p><u>Support</u></p> <p><u>Scottish Water (Ref 256/5)</u> - Support and will work closely with Local Authority and participate in the masterplan process.</p> <p><u>Trustees of The Glasgow Jewish Community Trust (Ref 681/1)</u> Support Braidbar Quarry Still viable for development Long term phasing</p> <p><u>Nazir Ahmed (Ref 755/4)</u> - Support policy</p> <p><u>General</u></p> <p><u>Scottish Natural Heritage (Ref 964/1)</u> SNH understands that the situation with Braidbar Quarry has recently changed and that the increasing instability of the land has required it to be cordoned off from the public. As the Master Plan’s objective is now to simply investigate means by which the land could be made safe and appropriate land uses found, SNH largely agrees with the assessment presented in the SEA. However the predicted benefits in terms of Environmental Objectives 3 - Provide environmental conditions promoting health & wellbeing (including increasing opportunities for outdoor recreation) and 15 - Protect, enhance and create green spaces important for recreation and biodiversity - will only come about provided a sufficient extent of the land is left as green space post remediation and the majority of the area is not given over to housing or similar commercial land uses.</p> <p><u>Objections</u></p> <p><u>Barry Gladstone (Ref 1/1)</u> - Policy M4 Braidbarr Quarry boundary includes land that is owned by the properties 11-25 Braidpark Drive and should be amended to take this area out of the proposal site.</p>		

Sport Scotland (Ref 702/5) - Sports pitches on site, requirements of SPP need to be considered in the ongoing development of policy.

Modifications sought by those submitting representations:

Barry Gladstone (Ref 1/1) - Removal of properties 11-25 Braidpark Drive from Proposal.

Sport Scotland (Ref 702/5) - Sports pitches requirements must be recognised in proposal.

Summary of responses (including reasons) by planning authority:

Support

Scottish Water (Ref 256/5), Trustees of the Glasgow Jewish Community Trust (Ref 681/1), Nazir Ahmed (Ref 755/4)

The Council acknowledges and welcomes the support for Policy M4 and its longer term potential.

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

General

Scottish Natural Heritage (Ref 964/1)

The master plan for this site will identify the areas of the site to be developed for specific uses.

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

Objections

Barry Gladstone (Ref 1/1)

The highlighted area referred to appears to have Rights in Common and is contained within the Dickie title. It would therefore appear that the representee is correct to state that numbers 11 – 25 Braidpark Drive have an ownership interest in the highlighted area. Nevertheless, these ownership issues should not impact on the overall designation of the Masterplan area as the eventual developer of the site would have to resolve any ownership disputes to allow an approved development to proceed. As such, it is recommended that the M4 Braidbar Quarry boundary in the Proposed Plan is retained in its current form.

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

Sport Scotland (Ref 702/5)

Policy M4 states that appropriate development will be supported in accordance with Policy M1: Master plans. A comprehensive development brief will require to be prepared for this site. The retention/replacement/relocation of the playing fields will be integral to this brief.

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

Reporter's conclusions:Land ownership

1. I can accept that when the master plan is prepared, it will be necessary to take into account the ownership of this small area of ground when wider land uses are being planned. The land in question is closely related to the wider Braidbar Quarry site in both physical and visual terms and I believe there is no inherent reason why a satisfactory design solution could not be achieved. On this basis, I agree with the council that it is not necessary to adjust the boundary of the area of Policy M4.

Existing playing fields

2. Policy M4 confirms that Braidbar Quarry will be retained as open space until an appropriate remediation strategy can be implemented and is shown on the proposals map to be subject to Policies D4 and D5. These policies offer strong protection for both the green network and urban greenspace. However, it is intended that the site should be a longer term development opportunity. Clearly, at that time, it will be necessary to take account of any proposed loss of open space and the particular uses to which that open space is put.

3. Scottish Planning Policy indicates that outdoor sports facilities should be safeguarded from development other than in certain specified circumstances. These include proposed development that is ancillary to the principal use of the site as an outdoor sports facility or involving only a minor part of the facility, not affecting its use and potential for sport and training. Where an outdoor sports facility would be lost, it should be replaced either by a new facility of comparable or greater benefit in a location convenient for users, or by upgrading an existing outdoor sports facility.

4. The guidance in Scottish Planning Policy is clear in this respect and, in due course, when Braidbar Quarry comes forward as a development opportunity, the future of the outdoor sports facilities must be safeguarded, either within the site itself or at an appropriate, convenient alternative location. Indeed, in response to Sport Scotland, the council confirms that the future of the playing fields will be integral to the development brief for the site.

5. All in all, I am satisfied that Policy M4: Braidbar Quarry, provides adequate protection for the existing open space in the meantime. The future of the sports facilities will be considered when, in due course, development proposals are formulated through the preparation of a comprehensive development brief. Given the importance of the development brief as described above, I consider that the council's intention to prepare it as supplementary guidance (see paragraph 4.1.3) should also be stated in the policy.

Reporter's recommendations:

I recommend that the following modification be made:

1. Add: "The development brief will be adopted as supplementary guidance." to Policy M4.

Issue 3.7	Master Plan Drumby Crescent	
Development plan reference:	Policy M5: Drumby Crescent Policy SG1.15 Drumby Crescent Playing Fields	Reporter: Richard Dent
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Lidl UK GmbH (Ref 76/1) (Ref 76/2) (Ref 76/3) Scottish Water (Ref 256/11) Roger Spooner (Ref 387/4) Sport Scotland (Ref 702/6) Nazir Ahmed (Ref 755/7) Carol A Gilbert, SPT (Ref 969/2)</p>		
Provision of the development plan to which the issue relates:	<p>Chapter 4: Key Area for Change and Settlement Strategies Para. 4.11 – 4.12.1 Policy SG1: Housing Supply</p>	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy M5: Drumby Crescent</u></p> <p><u>Support</u></p> <p><u>Scottish Water (Ref 256/11)</u> - Support and will work closely with Local Authority and participate in the master plan process.</p> <p><u>Nazir Ahmed (Ref 755/7)</u> - Support policy</p> <p><u>Objection</u></p> <p><u>Lidl UK GmbH (Ref 76/1)</u> Development of Isobel Mair School and Williamwood High School playing fields, Drumby Crescent should include a mid-sized supermarket (such as a discount food store) within the range of uses. Support mixed use development on site, however, proposed uses fail to maximise the planning benefits of the site: A medium sized supermarket in particular a discount foodstore would maximise the potential of the site Key benefits: local shopping facility to serve need in local area, reinforce local provision, easily accessible by a range of transport modes inc. Rail, bus, walk and cycle catchments objectives that support this development: sustainable benefits of highly accessible site, addresses quantitative and qualitative retail deficiencies in area (north Clarkston), significant economic benefits, no significant adverse retail impacts on existing town centres. Store would be 0.60ha of total 4ha site. Site would be reduced from 40 to 20 units. para 4.12.1: “a mixed use healthcare centre, medium sized supermarket (up to approximately 1500-1750 sq m GFA) including discount food store, and housing development of the site.....”</p>		

Sport Scotland (Ref 702/6) - Sports pitches on site, requirements of SPP need to be considered in the ongoing development of policy.

(b) Policy SG1.15 Drumby Crescent Playing Fields, Clarkston

General

SPT (Ref 969/2) - Opportunity should be taken to review location of park and ride spaces, pedestrian access to station and enhanced bus infrastructure and provision of information to serve new health centre

Objections

Lidl UK GmbH (Ref 76/2) (Ref 76/3)

(Ref 76/2): Amend remaining capacity to 20 units from 40 to accommodate mid-sized food store.

(Ref 76/3): Change allocation of part of site to accommodate medium sized supermarket 0.60ha for store

Would provide key benefits to local area

Easily accessible

Addresses inadequacies existing retail provision

Provides economic benefits

Roger Spooner (Ref 387/4) - Playing field should be protected under Green Network policy D8 and land used for community, ideally a playing field.

Modifications sought by those submitting representations:

(a) Policy M5: Drumby Crescent

Lidl UK GmbH (Ref 76/1) - Para. 4.12.1: “a mixed use healthcare centre, medium sized supermarket (up to approximately 1500-1750 sq m GFA) including discount food store, and housing development of the site.....”

Sport Scotland (Ref 702/6) - Policy should reference protection of sports pitches.

(b) Policy SG1.15 Drumby Crescent Playing Fields, Clarkston and Policy SG1: Housing Supply

Carol A Gilbert, SPT (Ref 969/2) - Opportunity should be taken to review location of park and ride spaces, pedestrian access to station and enhanced bus infrastructure and provision of information to serve new health centre

Lidl UK GmbH (Ref 76/2) (Ref 76/3) - Amend remaining capacity to 20 units from 40 to accommodate mid-sized food store.

Change allocation of part of site to accommodate medium sized supermarket

Roger Spooner (Ref 387/4) - Playing field should be protected under Green Network policy D8.

Summary of responses (including reasons) by planning authority:**(a) Policy M5: Drumby Crescent****Support****Scottish Water (256/11), Nazir Ahmed (755/7)**

The Council acknowledges and welcomes the support for Policy M5.

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

(b) Policy M5: Drumby Crescent , Policy SG1.15 Drumby Crescent Playing Fields, Clarkston & Policy SG1: Housing Supply - In December 2012, a Development Brief (CD/41) was prepared for this site which promoted a mixed use development opportunity comprising housing and health/community use. Planning Application 2013/0415/TP (CD/85) for the erection of a health and care centre with associated car parking was approved in October 2013. The land take up for the health centre was greater than anticipated. A revised Planning Brief will be prepared to reflect the proposed remaining residential land elements.

General

SPT (969/2) - A total of 32 park and ride spaces have been set aside within the proposed 300 space car park as part of the above application. Vehicular access will be formed off Drumby Crescent, approximately 80 metres from the junction with Eastwoodmains Road. Pedestrian access will be formed at the junction of Drumby Crescent and Eastwoodmains Road, with additional pedestrian access also being provided through the vehicular entrance. The Council will continue to investigate options to improve access to the train station although there are no committed proposals at this time. Improved access was identified in the Development brief. The site lies adjacent to an existing bus route.

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

Objections**Lidl UK GmbH (76/1, 76/2, 76/3)**

The remainder of the site is allocated for housing only, as identified in the Proposed Plan (SG1.15 for 40 units). Delivery of housing at this site remains a key Council aspiration. The capacity shown is notional with final numbers still to be determined. These will be subject to review through the preparation of a revised brief but numbers will not be hugely different.

The sequential approach for site selection contained in the Plan directs new retail uses towards town and neighbourhood centres, and as this site is located outwith Clarkston town centre, a retail development would not generally be supported by the Council. Due to the larger than anticipated land take up for the health centre the Council is supportive of residential development only on the remainder. The site does not have capacity for more than one alternative use. For these reasons, it is considered that a mid-sized supermarket is not supported at this site and the site is continued to be allocated for housing.

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

Sport Scotland (702/6), Roger Spooner (387/4)

This site is identified in the Adopted Local Plan as a housing site. The Proposed Plan promotes the site as being suitable for a mixed use healthcare centre and housing development. The pitches are currently unmanaged and used only for informal recreation such as dog walking. They are not currently used for sporting activity. The existing sports ground is to be redeveloped for housing, however, alternative provision of sports pitches remains throughout the wider area. The Council will also encourage the provision of Green Networks within the revised Brief, referred to above.

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

Reporter's conclusions:**(a) Policy M5: Drumby Crescent**

1. Planning is a dynamic process and the health care centre, which incorporates a park-and-ride facility, is now under construction. As explained by the council, the size of the development is greater than anticipated and therefore a revised planning brief is proposed to replace the brief prepared in 2012.
2. I note that the 2012 brief refers to a development of "approximately 30-40 houses" including affordable housing. The revised brief will re-assess the capacity and it is anticipated the ultimate total is unlikely to be significantly reduced.
3. Insofar as the sports pitches are concerned, the council points out that these are unmanaged and now offer only informal recreation. I note the 2012 brief refers to "the former playing field site". It certainly appears that the pitches no longer provide an active facility and, taking account of the condition of the site, have not done so in recent times. In terms of the guidance in Scottish Planning Policy, therefore, there is not an outdoor sports facility requiring to be safeguarded. In turn, I do not consider it essential for the revised development brief to take particular account of this former land use, especially having regard to the council's opinion that there is adequate alternative provision of sports pitches throughout the wider area.
4. Turning to the provision of a food store on the site, I agree that housing would be a suitable land use for the balance of the site. With regard to the sequential approach, I consider the site to fall within the lowest category of preference for additional retail floorspace as set out in Scottish Planning Policy. Whilst I accept that the site is relatively easily accessible by a choice of transport modes, I do not consider that this advantage outweighs the low sequential rating. In reaching this view, I have noted the existing provision described by Lidl but I am not persuaded by the conclusion "that existing retail provision is very limited". Indeed, on the face of the matter, the general vicinity appears to be relatively well served by a range of retail facilities of which the largest, Clarkston Toll, is within one kilometre of the site. On the foregoing basis, I conclude that the revised development brief should not make provision for a mid-sized retail unit and, accordingly, the proposed plan should similarly not make a reference to this effect.
5. All-in-all, it is appropriate for the revised development brief to focus on the health centre, including the park-and-ride facility, and housing as the principal land uses within the site. Other objectives set out in the 2012 brief – retention and integration of existing natural landscaping, habitat enhancement, pedestrian links, and strong public realm – remain important considerations. In this respect, Policy M5 provides an adequate basis

for the revised development brief. Given the importance of the development brief as described above, I consider that the council's intention to prepare it as supplementary guidance (see paragraph 4.1.3) should also be stated in the policy.

(b) Policy SG1.15, Drumby Crescent Playing Fields

6. Insofar as the representations by Sport Scotland and Lidl UK have been assessed above under Policy M5, my conclusion in respect of Policy SG1.15 is that the housing land allocation should remain. Schedule 8 shows the remaining capacity to be 40 units. As explained, it is likely that this total will be reduced, albeit probably not significantly. At this time it is appropriate to retain this figure within Schedule 8 in the knowledge that the revised development brief will identify the capacity taking into account the size of the site for the health centre.

7. Mr Spooner requires the protection of the playing field as part of the Green Network but I have previously concluded that housing is an appropriate land use for the site. I have no compelling evidence that a playing field at this location would provide a particular community benefit, especially as the council has indicated that there is adequate provision within the wider neighbourhood. Although Mr Spooner has referred to Policy D8, Natural Features, the site does not fall within the scope of that policy. In any event, as referred to above, the revised development brief for the site is likely to consider the retention and integration of existing natural landscaping and habitat enhancement. This potential should be capable of realisation whilst at the same time retaining site SG1.15 within Schedule 8.

8. In general terms, the Strathclyde Partnership for Transport has requested a review of various aspects of public and private transport provisions in respect of the new health centre. The council has provided certain assurances and I believe that, where possible and appropriate, these matters should be explored through the revised development brief.

Reporter's recommendations:

I recommend that the following modification be made:

1. Add: "The development brief will be adopted as supplementary guidance." to policy M5.

Issue 3.8	REGENERATION ISSUES	
Development plan reference:	Policy M6: Regeneration Areas	Reporter: Dilwyn Thomas
Body or person(s) submitting a representation raising the issue (including reference number):		
Margaret Gray (Ref 231/4) Co-operative Group (Ref 254/4) Scottish Water (Ref 256/6) Nazir Ahmed (Ref 755/8)		
Provision of the development plan to which the issue relates:	Chapter 4: Key Area for Change and Settlement Strategies Para. 4.13 – 4.14.2	
Planning authority's summary of the representation(s):		
<p><u>Policy M6: Regeneration Areas</u></p> <p><u>Support</u></p> <p><u>Margaret Gray (Ref 231/4)</u> - Support regeneration of Barrhead M6.1. Proposed plan will further enhance the area by creating housing building opportunities and more jobs for people living in Barrhead.</p> <p><u>Scottish Water (Ref 256/6)</u> - Support the regeneration of areas set out in policy.</p> <p><u>Nazir Ahmed (Ref 755/8)</u> - Support policy</p> <p><u>Objection</u></p> <p><u>Co-operative Group (Ref 254/4)</u> - Policy states that proposals for each of the town centres are show in the schedules. Its is unclear what the proposals are for Neilston, Thornliebank and Busby having reviewed the schedules.</p>		
Modifications sought by those submitting representations:		
<u>Co-operative Group (Ref 254/4)</u> - Policy should be clearer on what the proposals are for each of the regeneration areas.		
Summary of responses (including reasons) by planning authority:		
<p><u>Policy M6: Regeneration Areas</u></p> <p><u>Support</u></p> <p><u>Margaret Gray (231/4), Scottish Water (256/6), Nazir Ahmed (755/8)</u> The Council acknowledges and welcomes the support for Policy M6.</p> <p><u>It is not proposed to modify the Plan based upon the above.</u></p>		

Objection**Co-operative Group (254/4)**

Policy M6 states that relevant proposals for each of the centres are shown in the Proposed Plan's Schedules. This is inaccurate as only some of the identified regeneration areas have specific development proposals contained in the Schedules.

If the Reporter is so minded to recommend that the Representation from GL Hearn is accepted and the Plan modified, as set out below, the Council would be supportive of this minor modification because it would strengthen the policy and would not have any implications for the LDP Strategy or other policies within the LDP.

Para. 4.14.2 is deleted and replaced to read (new text in italics):

The Proposed Plan's Schedules contain details of various proposals that have been identified for a number of these locations. Appropriate complementary uses and any future proposals for these locations will also be supported when considered to be in accordance with other policies of the Plan.

In addition, to be in accordance with the other identified regeneration areas, it is recommended that a further minor change should be supported.

Bullet point one M6.1 is modified to read (additional text in italics):

- M6.1 Barrhead Town Centre

Reporter's conclusions:

1. Policy M6 in the proposed plan states:

"4.14 Policy M6: Regeneration Areas

4.14.1. The council will continue to support the regeneration and environmental enhancement and public realm improvements in the following locations:

- M6.1 Barrhead;...
- ...M6.5 Neilston Neighbourhood Centre;
- M6.6 Thornliebank Neighbourhood Centre;
- M6.7 Busby Neighbourhood Centre.

4.14.2. Relevant proposals for each of the centres are shown in the proposed plan's schedules. Appropriate complementary uses will also be supported in accordance with other policies of the plan."

2. An adjustment is sought to the proposed plan which would clarify the proposals for Neilston, Thornliebank, and Busby Neighbourhood Centres. A further representation expresses support for the plan's focus on the regeneration of Barrhead.

3. The planning authority proposes to change the plan by indicating it only contains details of various proposals for some of the locations identified in Policy M6. It also proposes to indicate that it will support complementary uses in all of the locations listed in the policy, as well as proposals which accord with other policies in the plan. Furthermore, it intends to clarify that Policy M6 is referring to Barrhead town centre. In line with Scottish Planning Policy, the town and neighbourhood centres listed in the policy form

part of a network of centres throughout the area. The proposed changes address the matters raised in representations, and are reasonable and necessary to clarify the terms of the plan.

4. Overall, adjustments are required to the proposed plan.

Reporter's recommendations:

I recommend that the following modification be made:

1. Adjust Policy M6 to read (*changes in italics*):

“4.14 Policy M6: Regeneration Areas

4.14.1. The council will continue to support the regeneration and environmental enhancement and public realm improvements in the following locations:

- M6.1 Barrhead *Town Centre*;...
- ...M6.5 Neilston Neighbourhood Centre;
- M6.6 Thornliebank Neighbourhood Centre;
- M6.7 Busby Neighbourhood Centre.

4.14.2. *The proposed plan's schedules contain details of various proposals that have been identified for a number of these locations. Appropriate complementary uses and any future proposals for these locations will also be supported when considered to be in accordance with other policies of the plan.*”

Issue 3.9	RURAL ISSUES POLICY M7 RURAL SETTLEMENTS	
Development plan reference:	Policy M7: Rural Settlements	Reporter: Dilwyn Thomas
Body or person(s) submitting a representation raising the issue (including reference number):		
Wallace Land Investment and Management (Ref 331/5) CALA Homes (West) and Paterson Partners (Ref 414/4) Persimmon Homes Ltd (Ref 743/1) Nazir Ahmed (Ref 755/9) Homes for Scotland (Ref 758/7) Lynch Homes (Ref 965/4)		
Provision of the development plan to which the issue relates:	Chapter 4: Key Area for Change and Settlement Strategies Para. 4.15 – 4.16.1	
Planning authority's summary of the representation(s):		
<p><u>Policy M7: Rural Settlements</u></p> <p><u>Support</u></p> <p><u>Nazir Ahmed (Ref 755/9)</u> - Support policy</p> <p><u>Objections</u></p> <p><u>Wallace Land Investment and Management (Ref 331/5)</u> Policy does not define rural settlements Policy requires mechanism which enables sustainable development to be considered Sites may be equally sustainable on settlement edges but not considered 'infill' Development sites proposed, of an appropriate scale and contribute to meeting identified need should be considered at application stage against all other policies in LDP Mechanism should allow council to approve housing development where not meeting housing requirement in full or 5 year land supply (SPP para 74/75). Proposals would then be required to accord with SP2, D1 and Technical Document.</p> <p><u>CALA Homes (West) and Paterson Partners (Ref 414/4)</u> Policy does not define what rural settlements are Requires mechanism which enables sustainable development of an appropriate scale to be considered Land on settlement edge may be as sustainable as infill Merits of specific site locations should be considered at application stage Mechanism should allow approval of sites if 5 year land supply not met</p> <p><u>Persimmon Homes Ltd (Ref 743/1)</u> Policy M7 attempts to focus new rural development within Neilston which goes against the requirements of SPP to provide a range and choice of developments. Excluding proposals from the other 3 rural settlements of Waterfoot, Eaglesham and Uplawmoor does not support the notion of sustainable economic growth within rural communities. These settlements require investment to enable the communities within them to benefit</p>		

from the economic gains which housing provides.

Homes for Scotland (Ref 758/7)

The approach to rural settlements is overly-restrictive.

A failure to promote new development will not assist with bringing down prices or promoting affordability, including making available new land for affordable housing using the affordable housing policy.

A range of high-quality residential environments is as important as a range of employment land in attracting businesses to locate locally

Lynch Homes (Ref 965/4)

Does not define rural settlements

requires mechanism to enable development in some circumstances

Modifications sought by those submitting representations:

Policy M7: Rural Settlements

Wallace Land Investment and Management (Ref 331/5) CALA Homes (West) and Paterson Partners (Ref 414/4), Lynch Homes (Ref 965/4)

Definition of rural settlement should be set out in Plan.

Revised Text:

Development in the rural settlements will be of an appropriate scale limited to infill development, compatible with the character and amenity of the area and will focus on meeting locally identified needs and to reinforce their roles and functions.

Proposals for development in rural settlements which would assist the Council in maintaining a 5 year land supply at all times will be considered in accord with Strategic Policy 2, Policy D1 and the Technical Document - Framework for Assessing Unallocated Proposals.

Persimmon Homes Ltd (Ref 743/1) - Residential allocations should be spread throughout the four rural settlements to provide a range and choice of sites for development and to encourage their sustainable economic growth.

Homes for Scotland (Ref 758/7) - Additional sites should be allocated in each of the rural villages to meet the full Strategic Plan requirement of 5700 to 2025.

Summary of responses (including reasons) by planning authority:

Support

Nazir Ahmed (Ref 755/9)

The Council acknowledges and welcomes the support for Policy M7.

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

Objections

Wallace Land Investment and Management (Ref 331/5), CALA Homes (West) and Paterson Partners (Ref 414/4), Persimmon Homes Ltd (Ref 743/1), Homes for Scotland (Ref 758/7), Lynch Homes (Ref 965/4) - As demonstrated under Issue 2.1.2:

Development Strategy the Plan sets out a development strategy that will guide and direct

growth to the most sustainable locations up to 2025 and beyond. The Plan provides a generous housing land supply to meet the requirements of Scottish Planning Policy (SPP) (CD/69) and the Approved Strategic Development Plan (SDP) (CD/81) and no additional land releases are required as demonstrated under Issue 9.1: Housing Supply.

There remains considerable pressure for development in the Green Belt surrounding both the urban and rural settlements. A number of sites have been promoted for development through the consultation to the MIR and the Proposed Plan. Proposals have been evaluated through the Site Evaluation and SEA at relevant stages to inform each Plan stage. A detailed green belt boundary review has also been undertaken, as set out in Appendix D1 of the Monitoring Statement (CD/08). The land/sites selected for release from the Green Belt are those which are considered to be the most capable of accommodating development and delivering the aims of the Plan.

Para 92 and 94 of SPP address housing issues in rural areas. Para 92 of SPP states that “The planning system has a significant role in supporting sustainable economic growth in rural areas. the aim should be to enable development in all rural areas which supports prosperous and sustainable communities whilst protecting and enhancing environmental quality”. Para 94 states that development plans must also allocate a generous supply of land in rural areas.

A detailed analysis of the 4 rural settlements of Uplawmoor, Neilston, Waterfoot and Eaglesham was undertaken (Appendix C of the Monitoring Statement refers) to inform the Plan. This study looked at a variety of factors including role and function, infrastructure, services and facilities, public transport, current consents and previous build rates to assess whether the rural settlements could accommodate further growth. The 4 villages perform different roles and functions and are of differing sizes. The Plan does not provide a definition of a rural settlement however states at Para 2.2.2 that these 4 villages are located within the rural hinterland of the Authority and due to their size and location have been assessed together as rural settlements.

The results of this exercise informed Policies M7 and M8 of the Proposed Plan and are set out in Appendix C Para 2.1-2.4 of the Monitoring Statement. A number of Green Belt releases were identified for the village of Neilston only (Policy M8) with development restricted to infill opportunities compatible with local character and use in the other 3 rural settlements of Eaglesham, Uplawmoor and Waterfoot (Policy M7). In respect of Neilston an Infill Development Strategy will be prepared as SPG to expand upon the land use aspirations of the Neilston Charter.

The representations received seek the inclusion of additional text that would allow additional proposals to be considered. However, Strategic Policy 2 provides the appropriate framework for considering alternative proposals on sites not allocated in the Plan. It is therefore considered that Policy M7 when read alongside Strategic policy 2 is sufficient to consider future applications.

It was viewed that the approach for the rural settlements is appropriate to deliver sustainable levels of growth, provide a range and choice of sites and opportunities and not undermine the overall Development Strategy. This approach to development in the rural settlements accords with the requirements of SPP.

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

Reporter's conclusions:

1. Policy M7 in the proposed plan states:

“4.16 Policy M7: Rural settlements

4.16.1. Development in the rural settlements will be limited to infill development only, compatible with the character and amenity of the area and will focus on meeting locally identified needs and to reinforce their roles and functions.”

2. Adjustments are sought to the proposed plan which would: provide a definition of a rural settlement; revise the text of the policy to delete the reference to infill development, and include a mechanism which enables sustainable development of an appropriate scale (allowing for development at the settlement edge); and provide residential allocations in all 4 settlements. The planning authority proposes no change to the plan.

3. The 2010 Scottish Planning Policy and Scottish Planning Policy (2014) indicate that the purposes of the green belt include directing planned growth to the most appropriate locations and supporting regeneration, and protecting and enhancing the character, landscape setting and identity of towns. They seek to promote a pattern of development in the rural area that is appropriate to its character and the challenges it faces, and to encourage rural development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality. In the pressured and accessible rural areas, they also aim to protect against an unsustainable growth in long distance car based commuting and suburbanisation of the countryside, and support the provision of most new urban development within, or in planned extensions to, existing settlements. They require that a range and choice of housing sites be allocated to meet the housing land requirement.

4. I am not persuaded that it is necessary to provide a definition of rural settlements. The proposed plan clearly identifies Uplawmoor, Neilston, Waterfoot, and Eaglesham as the 4 settlements in the rural area of East Renfrewshire, and I consider that this is sufficient.

5. I note that the monitoring statement for the proposed plan shows that the planning authority has assessed the 4 settlements, which are of different sizes and character, and concluded that Neilston, the largest, can accommodate some additional development (Policy M8). A number of sites in and around the 4 settlements have also been considered at this examination, and are dealt with in other issues. I am not satisfied that it is necessary or appropriate to revise Policy M7 in the manner sought in the representations. The proposed plan provides sufficient land to meet the housing land requirement, includes flexibility and generosity, and provides a range and choice of sites across the planning authority's area. There is no requirement to allocate sites in every settlement.

6. The policy does not prevent housing development in the rural settlements, but reasonably provides opportunities for limited infill development. There are also some existing housing allocations still to be built out in the settlements. If there are future difficulties with the delivery of the land supply, Strategic Policy 2, and other policies in the plan, including Policy M7, can be used to assess proposals coming forward. The revisions sought to Policy M7 go beyond the terms of the rural exceptions policy referred to in Scottish Planning Policy (2014), as it is concerned only with the delivery of affordable housing on small sites. The policy as it stands is consistent with the thrust of

the approach in national guidance to development in pressured and accessible rural areas, and the green belt. In the circumstances, I believe that the policy should remain unchanged, and that no provision should be made within it for further development of the rural settlements.

7. Overall, no adjustment is required to the proposed plan.

Reporter's recommendations:

No modifications.

Issue 3.10	NEILSTON VILLAGE REGENERATION	
Development plan reference:	Policy M8: Neilston Village Regeneration	Reporter: Richard Dent
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E Hughes (Ref 5/1) Ian Davidson (Ref 9/3) Chelsea Healy (Ref 30/1) Steven Healy (Ref 31/3) John and Agnes Brown (Ref 43/1) (Ref 43/2) Mr and Mrs Colin Nicol (Ref 51/1) SEPA (Ref 70/9) (Ref 70/20) (Ref 70/23) (Ref 70/37) (Ref 70/41) Mactaggart and Mickel/AWG Property Ltd (Ref 132/1) (Ref 132/2) (<u>Supporting Documents submitted</u>) James Caldow (Ref 203/1) Co-Operative Group (Ref 254/5) Wallace Land (Ref 255/1) (Ref 255/2) (Ref 255/3) (Ref 255/4) Eleanor Milloy (Ref 285/1) Colin High (Ref 307/1) Davidina M Fox (Ref 336/2) Susie Stewart (Ref 408/3) Joyce Wallace (Ref 430/2) (Ref 430/3) (Ref 430/4) Susan Mathers (Ref 490/1) (Ref 490/2) (Ref 490/3) (Ref 490/4) Stewart Milne Homes (Ref 500/12) (<u>Supporting Documents submitted</u>) Gary Elliot (Ref 515/1) Andy Whiteford (Ref 568/1) Allan Stewart (Ref 621/1) Link in consultation with Barrhead, Arklet and Hanover Housing (Ref 669/3) Sport Scotland (Ref 702/7) Dawn Homes (Ref 712/1) (Ref 712/2) Nazir Ahmed (Ref 755/10) Neilston Development Trust (Ref 768/1) (Ref 768/2) Colin and Joanne Gardner (ref 859/1) John and Elizabeth Proud (Ref 860/1) Janet Gordon (Ref 865/2) Jim Sheriff (Ref 892/1) Neilston Community Council (Ref 894/3) Margaret and James Thomson (Ref 904/1) Geraldine Warner (Ref 917/1) Marion Mould (Ref 918/1) Lynch Homes (Ref 965/5) (Ref 965/10) Carol A Gilbert, SPT (Ref 969/3) Mohammed Siddique (Ref 982/1) Elderslie Estates (Ref 983/4) (Ref 983/5) (Ref 983/6)</p>		
<p><u>Appendix 1 – Common Objections List of Representees</u> Policy M8: Neilston Village Regeneration, Policy D13.17 Kingston Playing Fields, Neilston and Policy SG2.1 Neilston Jnrs, Neilston (44 reps)</p>		

<p>Provision of the development plan to which the issue relates:</p>	<p>Chapter 4: Key Areas for Change and Settlement Strategies Para. 4.17 – 4.18 –Neilston Village Regeneration Figure 11: Policy M8: Neilston Village Regeneration Policy D11.20 Crofthead Mill, Neilston Policy SG1.24 Crofthead Mill, Neilston Policy SG6.9 Crofthead Mill, Neilston Policy SG6.19 Crofthead Mill, Neilston Policy D13.17 Kingston Playing Fields, Neilston Policy SG2.1 Neilston Jnrs, Neilston Policy SG1: Housing Supply Policy SG2.2 Holehouse Brae, Neilston Policy SG2.3 Neilston Road, Neilston and Policy M8 Policy SG2.4 North Kirkton Road, Neilston and LDP60A/B New Site: LDP58/59 Nether Kirkton Farm LDP62B East Kingston Road LDP66 Uplawmoor Road LDP86 Springfield Road Land at the corner of Double Hedges Road and Harelaw Avenue Site Evaluation</p>
<p>Planning authority's summary of the representation(s):</p>	
<p><u>(a) Policy M8: Neilston Village Regeneration, Policy D13.17 Kingston Playing Fields, Neilston and Policy SG2.1 Neilston Jnrs, Neilston</u></p> <p><u>Support</u></p> <p><u>Ian Davidson (Ref 9/3)</u> Support modest expansion, and specifically: Increase in car parking at Neilston station using part of Kingston Playing Fields subject to the rest of the fields being retained as greenspace. Mixed housing industrial at 'The Old Mill' subject to road safety improvements A736 junction including reduced speed limit.(SG1.24) The possibility of re-introducing Neilston-low train halt for Glasgow - Kilmarnock line. Limited housing development at Hillside Road (SG2.2)</p> <p><u>James Caldow (Ref 203/1)</u> Pleased to see more park and ride at railway and end of playing fields. Will be glad to see changing hut disappear as it is an eyesore, attracts graffiti and acts as a spot for 'neds'. Community leisure facilities are a priority and may help with aimless groups who gather in the village. Any facility would have to be well secured and located away from the station end where it may be vulnerable. For new houses better shopping facilities are required present are not adequate. Increased traffic will happen as plans progress but for the betterment of Neilston it will be for the good.</p> <p><u>Co-operative Group (Ref 254/5)</u> - Supportive of regeneration of Neilston.</p> <p><u>Wallace Land (Ref 255/3)</u> - Support - as long as infill development strategy does not apply to Neilston road site or does support development of 150 houses at Neilston Road.</p>	

Susan Mathers (Ref 490/1)

Infill Strategy appropriate for housing in the long term
Ageing population in Neilston will move away to be near their children who do not live in Neilston freeing up low cost housing for new families

Gary Elliot (Ref 515/1)

Excited about the possible regeneration of area
Park (Kingston Playing Fields) has been underdeveloped for years
Fantastic opportunity for the community to get an asset that will be the envy of other towns
It could solve the issue of parking on match days
Hopefully the facility will be for the use of all the community and would be good for school kids

Andy Whiteford (Ref 568/1)

Support community sports hub as pitches at Kingston Playing Fields often unused and would provide an all weather facility
Could incorporate range of activities to meet needs of the community
Could incorporate new children's play area
Could provide opportunities for local people in terms of upskilling, volunteering and employment
Could attract funding from SportScotland and would be a fantastic opportunity to take advantage of their funding scheme to create 150 sport hubs
Could assist in long term for funding for other facilities such as the swimming pool
100% behind proposals
Would be a mistake to miss such a huge opportunity
Families with young children will benefit and look forward to using facilities

Nazir Ahmed (Ref 755/10) - Support policy**Neilston Development Trust (Ref 768/1)**

Welcome similarities between the plan and the Charter including shared planning objectives, willingness to collaborate and integrated social, environmental and economic goals. Neilston's SPG will be responsive planning
Very supportive of key Charter themes in LDP
Phrasing of key parts of the policy is very significant
Consider Kingston Playing fields description in policy to be too specific and premature
No objection to the principle of increased population, if infrastructure provision taken into account
Potential clash between conventional housing allocations and those that will be identified under SPG
Effectiveness requirements conflict with infill site allocation through SPG
Land allocations on Green Belt sites will dilute potential for housing sites brought forward through SPG
Green Belt sites allocated are not the most sustainable in terms of links etc., and appear allocated based on developer readiness
Infill approach favourable over the sites allocate under the plan, and in particular SG2.3
Neilston is an 'Accessible Small Town' under Scottish Urban Rural Classification

SPT (Ref 969/3) - Have already provided full funding to take forward park and ride improvements at rail station

Summary of Common Objections

(Full list of representees set out in Appendix 1 and objections set out in Appendix 2 with summarised key points set out below.)

- Houses should not be built on Greenfield land when there are large undeveloped Brownfield sites for example in Barrhead.
- Object to proposals for 500 houses- traffic and parking is already a struggle in the village.
- Infill strategy will not infill but will extend village dramatically.
- Proposals not raised in MIR
- Role and function of Town Team needs to be clarified.
- Need more consultation with community.
- Development will destroy the village, its atmosphere and safety.
- Retain as historic village.
- Development will lead to coalescence between Barrhead and Neilston.
- Developments do not defend robust Green Belt Boundaries.
- Loss of wildlife/environmental impact on Green Belt
- Impact upon schools, nursery and doctors.
- Disparancy between work of LDP, Neilston Town Team and Neilston Community Council.
- Object to development at Holehouse Brae, Neilston Road, Crofthead Mill, North Kingston Road, developments.
- SG2.3 and SG2.4 have narrow access roads.
- Kirkton Road has archaeological interest.
- Lack of public transport in village especially after 6pm.
- Support park and ride proposals.
- Object to the loss of sports facilities and public recreation space
- Proposals for Kingston Playing fields look overcrowded and will overwhelm the new station car park.
- Lose existing facilities (basketball, swings etc) - reduce the amount of space for recreation available in the village as a whole.
- Neilston Juniors and other youth teams, amateur leagues, school children will need to use facilities at the same time there will be less access as only one group can use the space at a time.
- Neilston Jnrs would need own facilities so some facilities would not be able to be used by general public.
- Kingston Playing fields is also used for other informal recreation and exercise and this access will also be lost.
- Light pollution.
- Brig O'Lea should be redeveloped for Neilston Juniors – need to improve parking.
- Upgrade Kingston Playing Fields to include new changing rooms, hub, car park.
- Swimming baths and surrounding area could accommodate sports hub.
- Skatepark petition should be represented in plan
- To what extent will the facilities benefit the Neilston community will they bring in other users and charge?
- The area around Neilston train station could be developed to provide a sports centre and car parking - Restore the former rail bridge over Double Hedges Road for access.
- Support development of the mill on Lochlibo Road and Cowdenhall access/woodland.
- 4.17.3 Unsatisfactory wording, deceitful and full of jargon. Enables Council to do

what it wishes in the future regardless of Green Belt or countryside.

- Proposals not raised in MIR
- Crossfunding, developer contributions needs to be explained.
- No figure provided for number of enabling houses.

Other Objections

Sport Scotland (Ref 702/7) - Seek assurances Neilston Jnrs/Kingston Playing Fields is assessed against requirements of SPP and East Renfrewshire Sports facility and Pitch assessment Report 2009.

Elderslie Estates (Ref 983/4)

Support approach to regeneration generally.

Suggest guidance includes Neilston's hinterland as well as the village, taking account of the village's functions in terms of adjoining countryside.

Entitle SPG Neilston Development Strategy

(b) Policy D11.20 Crofthead Mill, Neilston

Objection

SEPA (Ref 70/9) - Assessment of flood risk required.

Policy SG1.24 Crofthead Mill, Neilston

Support

John and Agnes Brown (Ref 43/2) - Preference to development of mill site of all sites in Neilston.

Objection

SEPA (Ref 70/20) - Assessment of flood risk required.

Link in consultation with Barrhead, Arklet and Hanover Housing (Ref 669/3) - Sites in plan Crofthead Mill and Station Yard will not deliver housing and should be removed from plan

Wallace Land (Ref 255/4) - Crofthead Mill and Station yard have not been subject to planning applications and recognised in the case of Crofthead Mill as having difficulties in development and not counted as part of effective land supply. It is clear that Neilston Road is the preferred development site and it is unfair to judge it against these sites in the same context. Housing at Neilston Jnrs site may also not come forward quickly as there appears no developer interest.

Policy SG6.9 Crofthead Mill, Neilston

Objection

SEPA (Ref 70/37) - Assessment of flood risk required.

Policy SG6.19 Crofthead Mill, Neilston**Objection**

SEPA (Ref 70/41) - Assessment of flood risk required.

(c) Policy SG1: Housing Supply**(c.1) Policy SG2.2 Holehouse Brae, Neilston****Objection****Chelsea Healy (Ref 30/1)**

Object to section 3, 10

Object to housing being built at Holehouse Brae, Neilston. The field is used by many different people living in Neilston, Barrhead and Uplawmoor. The field is a recreation area and an important part of Neilston Green Belt.

Steven Healy (Ref 31/3)

Coalescence

No infrastructure

Traffic problems

Mactaggart and Mickel/AWG Property Ltd (Ref 132/1)

Fully support identification of land as housing site with notional capacity for 65 houses. Support Neilston as a settlement with capacity for growth and general links with the Neilston Town Charter.

Object to the phasing of Holehouse Brae scheduled for post 2025 development:

Site is effective now and complies with effectiveness tests

Owners wish to proceed

Expenditure committed to undertake as studies/procedures towards an early planning application

Other sites are not as far advanced

Early release will stimulate market in Neilston

Site scored well in evaluation

Require more flexibility in SG3 to achieve 5 year land supply at all times

Smaller sites in early phases of the plan required as larger masterplanned sites require time consuming arrangements put in place.

Joyce Wallace (Ref 430/4)

Green Belt loss

Steep site/poor access

Susan Mathers (Ref 490/4)

Preferable to other sites (if needed)

Less traffic impact

Stewart Milne Homes (Ref 500/12)

Risk to neighbouring Green Belt sites

Access - considered unlikely a suitable junction configuration could be devised

Lack of footpath on one side of street

Watercourse - wetland at low point of site very sensitive in terms of water quality and

quantity

Cast iron mains runs through site and will not have the capacity to supply development

Site is too steep for conventional development

Significant investment required to provide infrastructure

(c.2) Policy SG2.3 Neilston Road, Neilston and Policy M8

Support

Wallace Land (Ref 255/2)

Support development of site at Neilston Road for 150 homes

Committed to delivery of site

Site is effective

Objections

E Hughes (Ref 5/1)

Against proposal and do not want any houses built on this land.

Will spoil the landscape.

Should remain a village.

Will increase number of cars by 150 to 300 creating more pollution to the environment and ozone layer.

Increase in traffic through Barr Avenue and Glennifer View.

No Infrastructure in place to cope with extra houses.

Build houses on the land between Neilston and Uplawmoor instead.

Will cause major disruption for people trying to get to work and children to school due to diggers, lorries and roads being dug up.

Will cause increased electricity, gas and water usage.

John and Agnes Brown (Ref 43/1)

Object to Green Belt loss when brownfield sites available

Shanks site and old Volvo site should be built on first

Amenity and value of home will be affected

Traffic increase would put pressure on already busy roads at Kirkhill Brae.

In heavy snow and ice getting into the village is hazardous this will become worse/ cars would have to be abandoned in Barrhead

Traffic lights would be required at Lochlibo Road

If site was to go ahead: suggest access from Glennifer Way or direct to Robertson

Crescent, widening the road beside the church, traffic lights at the crossroads with Main Street and High Street or a mini roundabout. Significantly improve traffic flow in Kirkhill Brae in snow/icy conditions.

Planting to screen at perimeter

Single storey buildings at perimeter and two storey down slope towards Barrhead and Lochlibo Road.

SEPA (Ref 70/23) - Assessment of flood risk required.

Wallace Land (Ref 255/1) (Ref 255/4)

(Ref 255/1) Site Evaluation Assessment - Scoring of Neilston Road, Neilston is scored unfairly on natural heritage and effectiveness.

Effectiveness proven by - single ownership, parts of the site with constraints are not to be developed on, no contamination, no deficit funding required, confirmed interest from

several house builders, site unaffected by infrastructure constraints, housing is sole preferred use of site. Areas with natural heritage interest will be left free from development.

Amend natural heritage scoring to 0 from -1.

Amend effectiveness heritage scoring to 1 from -3.

(Ref 255/4) Do not support phasing of Neilston Road site (SG2.3). Firmly of the view site is unaffected by constraints and can be available for development immediately. Site is capable of delivering 150 units between 2014 and 2025, housebuilders regard site as an immediate opportunity.

Could be developed in 5 years contributing to 5 year land supply.

No need for the council to impose phasing restrictions.

Early release would see early delivery of affordable housing.

Not clear why a strategy based on 'consolidation' and 'controlled urban expansion' rather than the 'flexible long term growth' has been chosen.

Crofthead Mill and Station yard have not been subject to planning applications and recognised in the case of Crofthead Mill as having difficulties in development and not counted as part of effective land supply. It is clear that Neilston Road is the preferred development site and it is unfair to judge it against these sites in the same context.

Housing at Neilston Jnrs site may also not come forward quickly as there appears no developer interest.

Development Proposal and housebuilder support letters on file.

Site will as stated in policy M8 provide open space and landscaping to prevent coalescence. A robust and defensible long term settlement edge will be established.

Eleanor Milloy (Ref 285/1)

Loss of Green Belt

Effect on Wildlife

No real need for houses, existing houses take 3 years to sell

Increase in road congestion, air pollution and parking

Nursery and schools at capacity

Lack of local amenities - few shops, poor public transport, police, doctors and leisure facilities

Village character and landscape loss

Construction access will cause safety issues at Gleniffer View

Coalescence

Colin High (Ref 307/1)

Loss of character, country setting and rural country life

Distract from historical village image and coalescence

Increase in traffic volumes and congestion

Davidina M Fox (Ref 336/2)

Road capacity

School capacity

Lack of public transport

Joyce Wallace (Ref 430/2)

Should remain protected Green Belt

Underground natural waterway

Will affect D8.4 wildlife protection

Increased traffic

Difficult access in bad weather
 Object to construction traffic via Gleniffer View
 Subsidence issues

Susan Mathers (Ref 490/3)

Preferable to other sites (if needed)
 Less traffic impact

Neilston Development Trust (Ref 768/2) - Do not support site allocation

Neilston Community Council (Ref 894/3)

Ignores principles of Charter by loss of Green Belt and character and causes coalescence
 Proposed site not mentioned in Monitoring Statement
 MIR stated site was environmentally sensitive and would be inappropriate development in Green Belt
 Traffic safety concerns
 Need for more housing is not in Levern Valley
 Will increase carbon footprint through increased commuting
 Not opposed to sensitive infill development, site fails to meet this criteria

(c.3) Policy SG2.4 North Kirkton Road, Neilston and LDP60A/B

Objection

Mr and Mrs Colin Nicol (Ref 51/1)

Concerned development will prevent access to septic tank
 Kirkton Road not suitable for extra traffic from development

Joyce Wallace (Ref 430/3)

Poor access
 Increases risk of children crossing railway line

Susan Mathers (Ref 490/2)

Traffic congestion/impact
 Against policy D5
 Loss of recreation space
 Loss of wildlife

Dawn Homes (Ref 712/1) (Ref 712/2)

(Ref 712/1) It is recommended on basis of the conclusions drawn from the assessment in relation to Q3 and Q8 of the Site evaluation that the settlement boundary shown in red figure 11: Policy M8 Neilston Village Regeneration be amended to include site LDP60A
 Object to the conclusions of Site Evaluation Matrix (P16) in relation to site reference LDP 60B. While supporting the proposal in the plan to include site LDP 60B Dawn Homes do not agree with the conclusions arrived at for LDP60A and the scores given to this site in relation to: a) Q3 Impact of Development, ie. -6 and b) Q8 Effectiveness, ie. -3 and the subsequent recommendation that this site should be retained as greenbelt.

(Ref 712/2) non-inclusion of sites

Site for 150 homes
 Combined site 22.5 acres

Site is well contained by railway
 Low Green Belt value
 Defensible boundary

Margaret and James Thomson (Ref 904/1)

Green Belt and most attractive and picturesque land in village
 Will not produce robust boundary
 Access to open space
 Standing stone
 Views, spot used by tourists, educational
 Biodiversity
 Quality of life
 Poor access to site
 Should protect land

(c.4) LDP58/59 Nether Kirkton Farm

Objection

Mactaggart and Mickel/AWG Property Ltd (Ref 132/2)

Non-inclusion of sites: Nether Kirkton Farm LDP58/59
 Effective
 Sustainable
 Neilston highlighted as a growth villages
 120-150 units
 Would 'round-off Neilston in a clear defensible manner'
 Will not lead to visual coalescence
 Logical edge to settlement alongside SG2.3
 Site Evaluation Assessment -rescore of sites LDP58 and LDP59
 LDP58 total scoring from -12 to -2
 LDP59 total scoring from -7 to -2

(c.5) LDP62B East Kingston Road

Objection

Elderslie Estates (Ref 983/5)

Non-inclusion of site - East Kingston Road, Neilston LDP62b
 Q3 impact of development in Site Evaluation score should be amended as it is considered impact on the Green belt is only moderate
 Southern boundary will be contained by woodland, planting and footpath
 Northern boundary is visually contained by rising ground.
 Reducing score to -4 would release the site from Green Belt
 Some supporting info supplied
 Site LDP62a cannot contain 122 units as it is sterilised by pylons.

(c.6) LDP66 Uplawmoor Road

Objection

Susie Stewart (Ref 408/3)

Site Evaluation: Lintmill Uplawmoor Road LDP66

Score revised from -4 to -1, accept changes in criteria, but see no reason for change. Re-examine particularly Q4, 5, 8, 9. Score should be -5 or -6.

Allan Stewart (Ref 621/1)

Object to scoring of LDP66 Lintmill site off Uplawmoor Road
Overall scoring changed to -1 from MIR scoring of -4,
Q5 Natural Heritage from -1 to 0 - wildlife has improved so does not make sense
Similarly Effectiveness and affordable housing score
Score should be reassessed

Colin and Joanne Gardner (Ref 859/1)

Site Evaluation Assessment , Uplawmoor Road:
Scoring has been changed to make it most desirable site in village
Rescoring devalues Green Belt

John and Elizabeth Proud (Ref 860/1)

Site Evaluation - object to scoring of site
Rescore LDP66 from -1 to -6

Janet Gordon (Ref 865/2) - Site Evaluation rescoring makes site vulnerable to development

Jim Sheriff (Ref 892/1)

Site Evaluation:
Object to amended scoring - MIR -4, LDP -1
Lack of consistency in scoring, not impartial.

Geraldine Warner (Ref 917/1)

Site Evaluation: Object to revised scoring from -4 to -1

Marion Mould (Ref 918/1)

Site Evaluation: Object to revised scoring from -4 to -1

Lynch Homes (Ref 965/5) (Ref 965/10)

(Ref 965/5) Non inclusion of site LDP66

Site is effective

Could deliver 81 homes

Short term delivery

Green Belt can be repositioned

Site has no adverse impacts on surrounding landscape (Geddes report)

Does not meet SDP housing figure

Require effective sites short term

Not followed methodology from PAN2/2010 on effectiveness

Assumed annual build rate questioned

Housing shortfall 1600

No programming of expected completions

No effective 5 year land supply in medium term

(Ref 965/10) Policy M8 (point 2) should be amended as follows to confirm the inclusion of site (ref: LDP66) as follows:

The Council is also supportive of residential development at the following locations as shown on the Proposals Map and Schedule 10 and in accordance with Policy SG3.

(c.7) LDP86 Springfield Road**Objection****Elderslie Estates (Ref 983/6)**

Non-inclusion of site - Springfield Road LDP86

Q3 impact of development in Site Evaluation scoring should be amended as the impact on Green Belt is considered to be only moderate

Northern boundary is constrained by railway

Eastern boundary will be contained by a proposed woodland belt - reduce from -6 to -3

Q8 Effectiveness scoring is incorrect as site there are no difficulties - reduce from -3 to 0

(c.8) Land at the corner of Double Hedges Road and Harelaw Avenue**Objection****Mohammed Siddique (Ref 982/1)**

Land at the corner of Double Hedges Road and Harelaw Avenue

Object to land designation as Green Space

Land has been designated without consultation

Land is within residential area

Surrounding residential gardens not designated as Green Space

Site should be designated residential

Modifications sought by those submitting representations:**(a) Policy M8: Neilston Village Regeneration, Policy D13.17 Kingston Playing Fields, Neilston and Policy SG2.1 Neilston Jnrs, Neilston**

Ian Davidson (Ref 9/4), Gordon and Moira Robertson (Ref 10/1) (Ref 10/2), Graeme Orr (Ref 11/1), Cornelius McGuire (Ref 16/1) (Ref 16/2), Steven Healy (Ref 31/1)(Ref 31/2), Matthew Drennan (Ref 39/1) (Ref 39/2), John and Agnes Brown (Ref 43/3), Rachel Anne Drennan (Ref 44/1) (Ref 44/2) Jacqueline Drennan (Ref 45/1) (Ref 45/2) Matthew John James Drennan (Ref 46/1) (Ref 46/2), Ann Kelly (Ref 64/1), Anne Henderson (Ref 69/1), Sandra McKenzie (Ref 83/1), Mrs Findlay (Ref 85/1), Janet Wilson (Ref 96/1), Elizabeth Sills (Ref 201/1), James Pearson (Ref 202/1), Robert J G Mould (Ref 212/1), Margaret Shaw (Ref 230/1), Jonathan Kerr (Ref 264/1), Anna Kerr (Ref 266/1), Ian McKenzie (Ref 269/1), Ronald Sills (Ref 276/1), George E. Sills (Ref 277/1), Christine Sills (Ref 306/1), Davidina M Fox (Ref 336/1) (Ref 336/3), Susie Stewart (Ref 408/1) (Ref 408/2), Joyce Wallace (Ref 430/1) (Ref 430/5)(Ref 430/6), William McCarthy (Ref 559/1), Neil Dunn (Ref 607/1), Joyce Dunn (Ref 611/1), Allan Stewart (Ref 621/2), Ian Wood (Ref 640/1), Margaret Pettigrew (Ref 656/1), M V Wood (Ref 657/1), Sport Scotland (Ref 702/7), T D West (Ref 848/1), WDS Chalmers (Ref 853/1), Colin and Joanne Gardner (Ref 859/2), John and Elizabeth Proud (Ref 860/2), Harold B Smith and Mary S Smith (Ref 864/1), Janet Gordon (Ref 865/1), Jim Sheriff (Ref 892/2) Neilston Community Council (Ref 894/1) (Ref 894/2), Jean Sheriff (Ref 905/1), Elderslie Estates (Ref 983/4)

Strategy should focus on delivery of Brownfield and infill sites only.

Green belt proposals should be removed.

Policy will result in negative impacts upon infrastructure (roads, schools), the environment, amenity and will not deliver social or economic benefits.

Remove Proposals SG2.1 from Schedule 11 and D13.17 from Schedule 7 and redevelop

existing Brig o' Lea Football Ground.

Kingston Playingfield status should revert to L1 protected greenspace

Number of enabling houses should be shown.

Sports Hub should be accommodated in swimming baths and baths brought up to a high standard. With funds allocated the football stadium should be improved where it is. Area behind parking lot at school could be used to extend parking.

Improvement to children's swing park to something like the adventure site in Rouken Glen.

Davidina M Fox (Ref 336/3), Joyce Wallace (Ref 430/6), William McCarthy (Ref 559/1), T D West (Ref 848/1), Neilston Community Council (Ref 894/2), Gordon and Moira Robertson (Ref 10/1), Cornelius McGuire (Ref 16/2), Steven Healy (Ref 31/2), Matthew Drennan (Ref 39/1) Rachel Anne Drennan (Ref 44/1) Jacqueline Drennan (Ref 45/1) Matthew John James Drennan (Ref 46/1), Ann Kelly (Ref 64/1), Elizabeth Sills (Ref 201/1), Robert J G Mould (Ref 212/1), Christine Sills (Ref 306/1), Joyce Wallace (Ref 430/5), Neilston Community Council (Ref 894/1)

Co-operative Group (Ref 254/5) - Second bullet could be strengthened to clarify scale of infill development to be commensurate with the size of the town and associated population.

Wallace Land (Ref 255/3) - Policy should be clear that infill development strategy does not apply to Neilston road site (SG2.3).

Neilston Development Trust (Ref 768/1) - Bullet 8 changed to: "Enhancement of Kingston Playing fields as a key local asset by developing greenspace, sports and leisure provision in collaboration with stakeholders, including all local sports organisations inclosing Neilston Jnrs"

Susie Stewart (Ref 408/1)

4.17.2 Remove the word 'town'

4.17.3 Reword to prevent further loss of Green Belt.

Link in consultation with Barrhead, Arklet and Hanover Housing (Ref 669/3) -

Crofthead Mill and Station Yard will not deliver housing and should be removed from plan.

WDS Chalmers (Ref 853/1) - Term 'crossfunding, developer contributions', need to be clarified.

Elderslie Estates (Ref 983/4)

Suggest guidance includes Neilston's hinterland as well as the village.

Entitle SPG Neilston Development Strategy.

(b) Policy D11.20 Crofthead Mill, Neilston , Policy SG1.24 Crofthead Mill, Neilston Policy SG6.9 Crofthead Mill, Neilston Policy SG6.19 Crofthead Mill, Neilston

SEPA (Ref 70/9) (Ref 70/20) (Ref 70/37) (Ref 70/41) - Flood risk assessment required.

Sport Scotland (Ref 702/7) - Neilston Jnrs/Kingston Playing Fields must be assessed against requirements of SPP and East Renfrewshire Sports facility and Pitch assessment Report 2009.

(c) Policy SG1: Housing Supply**(c.1) Policy SG2.2 Holehouse Brae, Neilston**

Chelsea Healy (Ref 30/1), Steven Healy (Ref 31/3) Joyce Wallace (Ref 430/4), Susan Mathers (Ref 490/4) - Remove Proposal SG2.2 from Schedule 11 and redesignate as Green Belt.

Mactaggart and Mickel AWG Property Ltd (Ref 132/1) - Site SG 2.2 be re-phased to short-term housing land in Schedule 10.

Stewart Milne Homes (Ref 500/12)

Site should not be identified in LDP

Site Evaluation should be amended - Accessibility to public transport from 3 to 2, Effectiveness from -3 to -6, total score from -3 to -7

(c.2) Policy SG2.3 Neilston Road, Neilston and Policy M8

E Hughes (Ref 5/1), John and Agnes Brown (Ref 43/1), Eleanor Milloy (Ref 285/1), Colin High (Ref 307/1), Davidina M Fox (Ref 336/2), Joyce Wallace (Ref 430/2), Susan Mathers (Ref 490/3), Neilston Development Trust (Ref 768/2), Neilston Community Council (Ref 894/3)

Remove Proposal SG2.3 from Schedule 11 and redesignate as Green Belt.

SEPA (Ref 70/23) - Flood Risk Assessment required.

Wallace Land (Ref 255/1) (Ref 255/4)**(Ref 255/1)**

Site Evaluation Assessment - Scoring of Neilston Road, Neilston is scored unfairly on natural heritage and effectiveness.

Amend natural heritage scoring to 0 from -1.

Amend effectiveness heritage scoring to 1 from -3.

(Ref 255/4)

Remove phasing restrictions.

Make site for release immediately.

Remove reference to 'safeguarding' of the site.

(c.3) Policy SG2.4 North Kirkton Road, Neilston and LDP60A/B

Mr and Mrs Colin Nicol (Ref 51/1), Joyce Wallace (Ref 430/3), Susan Mathers (Ref 490/2), Margaret and James Thomson (Ref 904/1)

Remove Proposal SG2.4 from Schedule 11 and redesignate as Green Belt.

More effective as natural community site.

Dawn Homes (Ref 712/1) (Ref 712/2)

Dawn Homes while supporting the release of site LDP60B continue to maintain their position that the most effective land use solution would be achieved by the release of the combined LDP60A and LDP 60B area – 150homes in total.

(c.4) LDP58/59 Nether Kirkton Farm**Mactaggart and Mickel AWG Property Ltd (Ref 132/2)**

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10 – 120-150 units.

Site should be safeguarded post 2025.

Removal of site from Green Belt.

(c.5) LDP62B East Kingston Road

Elderslie Estates (Ref 983/5) - Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

Removal of site from Green Belt.

(c.6) LDP66 Uplawmoor Road

Susie Stewart (Ref 408/3), Allan Stewart (Ref 621/1), Colin and Joanne Gardner (Ref 859/1), John and Elizabeth Proud (Ref 860/1), Janet Gordon (Ref 865/2), Jim Sheriff (Ref 892/1), Geraldine Warner (Ref 917/1), Marion Mould (Ref 918/1) - Site requires to re-evaluated and scored less favourably.

Lynch Homes (Ref 965/5) (Ref 965/10)

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10 – 81 homes.

Removal of site from Green Belt.

Policy M8 (point 2) should be amended as follows to confirm the inclusion of site (ref: LDP66) as follows:

2. The Council is also supportive of residential development at the following locations as shown on the Proposals Map and Schedule 10 and in accordance with Policy SG3:Uplawmoor Road – 81 homes phased by 2025.

(c.7) LDP86 Springfield Road**Elderslie Estates (Ref 983/6)**

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

Removal of site from Green Belt.

(c.8) Land at the corner of Double Hedges Road and Harelaw Avenue**Mohammed Siddique (Ref 982/1)**

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

Removal of site from Open Space designation.

Summary of responses (including reasons) by planning authority:**(a) Policy M8: Neilston Village Regeneration, Policy D13.17 Kingston Playing Fields, Neilston and Policy SG2.1 Neilston Jnrs, Neilston****Support**

James Caldow (Ref 203/1), Co-operative Group (Ref 254/5), Wallace Land (Ref 255/3), Susan Mathers (Ref 490/1), Gary Elliot (Ref 515/1), Andy Whiteford (Ref

568/1), Nazir Ahmed (Ref 755/10), Neilston Development Trust (Ref 768/1), SPT (Ref 969/3)

The general support for Policy M8 is acknowledged and welcomed. The 'Infill Strategy' SPG will be progressed through the Charrette process and applies to gap and vacant sites within the village. The strategy does not apply to the Green belt release sites.

The Council maintains its position in relation to these 3 Green Belt sites. It is not viewed that these sites will detract from the infill strategy. The revised wording from Neilston Development trust is not supported.

Ian Davidson (Ref 9/3)

The Park & ride extension has funding and a current planning consent. The Crofthead Mill Project will be subject of various technical studies, including Transport Assessments. Although suggested as an aspiration within the Town Charter (CD/64) the feasibility of the concept of a Neilston low train halt on the Glasgow-Kilmarnock line has yet to be investigated.

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

Objections

Ian Davidson (Ref 9/4), Gordon and Moira Robertson (Ref 10/1)(Ref 10/2), Graeme Orr (Ref 11/1), Cornelius McGuire (Ref 16/1) (Ref 16/2), Steven Healy (Ref 31/1)(Ref 31/2), Matthew Drennan (Ref 39/1) (Ref 39/2), John and Agnes Brown (Ref 43/3), Rachel Anne Drennan (Ref 44/1) (Ref 44/2), Jacqueline Drennan (Ref 45/1)(Ref 45/2), Matthew John James Drennan (Ref 46/1) (Ref 46/2), Ann Kelly (Ref 64/1), Anne Henderson (Ref 69/1), Sandra McKenzie (Ref 83/1), Mrs Findlay (Ref 85/1), Janet Wilson (Ref 96/1), Elizabeth Sills (Ref 201/1), James Pearson (Ref 202/1), Robert J G Mould (Ref 212/1), Margaret Shaw (Ref 230/1), Jonathan Kerr (Ref 264/1), Anna Kerr (Ref 266/1), Ian McKenzie (Ref 269/1), Ronald Sills (Ref 276/1), George E Sills (Ref 277/1), Christine Sills (Ref 306/1), Davidina M Fox (Ref 336/1) (Ref 336/3), Susie Stewart (Ref 408/1) (Ref 408/2), Joyce Wallace (Ref 430/1) (Ref 430/5)(Ref 430/6), William McCarthy (Ref 559/1), Neil Dunn (Ref 607/1), Joyce Dunn (Ref 611/1), Allan Stewart (Ref 621/2), Ian Wood (Ref 640/1), Margaret Pettigrew (Ref 656/1), M V Wood (Ref 657/1), Sport Scotland (Ref 702/7), T D West (Ref 848/1), Neilston Community Council (Ref 849/1)(Ref 894/2), W D S Chalmers (Ref 853/1), Colin and Joanne Gardner (Ref 859/2), John and Elizabeth Proud (Ref 860/2), Harold B Smith and Mary S Smith (Ref 864/1), Janet Gordon (Ref 865/1), Jim Sheriff (Ref 892/2), Jean Sheriff (Ref 905/1), Elderslie Estates (Ref 983/4)

Between the MIR (CD/03) and Proposed Plan stages discussions over Neilston progressed to enable the general concepts to be presented within the Proposed Plan. The Plan has been the subject of extensive consultation as demonstrated in the DPS Participation Statement (CD/52) and Report of Conformity (CD/53). This has provided opportunity for all organisations and individuals to comment and influence the Plan, including the Town Team and Neilston Community Council.

The LDP has referred to Neilston as a village, under 'Neilston Village Regeneration'. For specific funding purposes the Neilston Regeneration Town Charter, prepared by Town Team has utilised the term Town. However, for the purposes of the Plan, Neilston is classified as a village and rural settlement. It is appreciated that the planning process can be technical however to be as accurate as possible the use of planning terms in

unavoidable. It is not viewed that paragraph 4.17.3 will detract from the aims of the Infill SPG.

Policy M8 and associated proposals are designed to establish a sustainable and economically viable long-term vision for Neilston. The main themes outlined within section 1 of Policy M8, will be the subject of the SPG 'Infill Development Strategy'. The ongoing Charrette process of community consultation will inform this document. An open governance structure for Neilston Town Team has been established to help delivery of projects. The Council will work with the community to identify projects that are viable and deliverable.

The SPG will consider a variety of matters including opportunities for development, streetscape and frontage improvements, greenspace enhancements and transport and traffic movement including accessibility throughout the settlement and linkages to it's rural hinterland. The SPG process allows sites of an appropriate scale to be identified; it is not viewed necessary to be prescriptive in the Plan on such matters. Policy M8 is clear that proposals must be commensurate with the character and amenity of the village. Retention of the character of the village will be a key consideration of the SPG.

Under section 2 of Policy M8, the 3 Green Belt locations on the outer edge of the village at Neilston Road, Kirkton Road and Holehouse Brae are not part of the SPG. The outer boundaries of these sites will provide a robust greenbelt boundary and defence against further development. Further comments on the preferred and alternative proposals are set out below.

A detailed analysis of the 4 rural settlements of Uplawmoor, Neilston, Waterfoot and Eaglesham was undertaken (Appendix C of the Monitoring Statement refers) to inform the Plan. This study looked at a variety of factors including role and function, infrastructure, services and facilities, public transport, current consents and previous build rates to assess whether the rural settlements could accommodate further growth. The results of this exercise informed Policies M7 and M8 of the Plan and are set out in Appendix C Para 2.1-2.4 of the Monitoring Statement. A number of Green Belt releases were identified for the village of Neilston only (Policy M8) with development restricted to infill opportunities compatible with local character and use in the other 3 rural settlements of Eaglesham, Uplawmoor and Waterfoot (Policy M7).

A number of representations state a failure of the Council to deliver the required infrastructure and services to support previous developments and query how this will be delivered to accommodate new proposed developments. These matters have been demonstrated under Issues 2.1.2 and Issue 2.3. It is viewed that the Action Programme (CD/07), the SPG on Development Contributions (2012) (CD/25) and the future infill strategy will be key in clarifying the development requirements for the village and each site. No significant issues have been raised by any of the infrastructure and service providers. It was viewed that cross funding contributions from the green belt release sites, may, if appropriate, assist with delivering other identified proposals.

Kingston Playing Field and the potential relocation of Neilston Juniors will be considered within a wider community & leisure theme. These are interrelated proposals which are key elements of the overarching Policy M8. A significant volume of representation was received on this matter.

Green space enhancements are a key aspiration of the Charter. Kingston Playing Fields

is a large area of open space that forms a central component of the green space within the village. Although the site is well used for informal and formal recreation purposes, opportunity exists to improve the facilities, usability and overall attractiveness of the site.

The Council acknowledges that within the Kingston playing fields there may be a reduction within the area covered by policy D6: Protection of Local Urban Greenspace. As yet there are no firm proposals this is why symbols are shown on the proposals map at this location. Capacity for any enabling development, if required, is yet to be determined.

A further analysis of this greenspace resource is required as part of the charrette process. However generally it should be recognised that any potential loss of Greenspace is likely to be more than compensated for/mitigated given the social, community and economic benefits which are likely to be achieved. The Council is supportive of positive discussions with Sports Scotland to achieve significant enhancement of the sporting facilities offered within the village.

The concept of establishment of a Sports/Community hub could include improvement of facilities for Neilston Juniors, which will enable a permanent long-standing solution to their difficulties. Relocation could involve redevelopment of their former site for residential development, with a notional capacity of approximately 35 houses.

It was stated that the proposal was not included within the MIR. The role of the MIR was to address strategic issues, not all sites and proposals are included within the MIR. The MIR Monitoring Statement (2011) at Appendix N 'Rural Settlement Analysis' provides an analysis of the role, function and sustainability of each of the 4 rural settlements in East Renfrewshire. The Monitoring statement does not refer to any particular project simply that the Charter projects will be accommodated into the Proposed Plan. The Plan has therefore been prepared to reflect the Charter and ongoing work of the Town Team.

The Council contend that Neilston is currently well served in comparison to other villages in East Renfrewshire (e.g. Swimming pool). It is considered that this will be further enhanced through the Community & Sports proposals for Kingston Playing Field. Relocation of the library and swimming pool is not considered a likely option. The swimming pool has recently reopened after refurbishment and significant Council funding.

The Council retains the view that Policy M8 and the proposals for Kingston Playing Fields remain appropriate and should be retained in the Plan. Matters of detail can be addressed through the preparation of the Infill SPG.

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

(b) Policy D11.20 , SG1.24, SG6.19 and SG6.9 Crofthead Mill, Neilston

Support

John and Agnes Brown (Ref 43/2)

The general support for this site is acknowledged and welcomed.

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

Objection**SEPA (Ref 70/9, 70/20, 70/41 and 70/37)**

In this particular case, it is acknowledged that there may be an issue with respect to flooding. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals. The comments of SEPA will be taken fully into account in the decision-making process.

If the Reporter is so minded to recommend that the Representations from SEPA are accepted and the Plan modified to reflect the need for a Flood Risk Assessment, the Council would be supportive of this modification because it would not have any implications for the wider area or other policies within the LDP.

In Schedules 12 and 13

Add F: Flood Risk Assessment Required.

Wallace Land (Ref 255/4), Link in consultation with Barrhead, Arklet and Hanover Housing (Ref 669/3)

It is appreciated that some sites are easier to be developed than others and therefore there are a range of proposals which encompass both long and short-term proposals. Both sites at Crofthead Mill and Station Yard are part of the Established Land supply and programmed for the long term.

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

(c) Policy SG1: Housing Supply

The following general comments are applicable to all the following sites.

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council's approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

Three new housing sites have been released in the Plan to meet housing needs in Neilston over the Plan period and beyond and alongside opportunities within the village boundary will deliver a sustainable level of growth for the village. These sites have been identified as a suitable housing site based upon the Site Evaluation, SEA and Green Belt review (Appendix D1 of the MS).

Objection**Geraldine Warner (Ref 917/1)**

The site Evaluation process has been undertaken in a fair and consistent manner across all sites.

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

(c.1) Policy SG2.2 Holehouse Brae, Neilston**Objection****Mactaggart and Mickel/AWG Property Ltd (Ref 132/1)**

Support for the allocation of the site is noted and welcomed. However, the representation is arguing that the site should be included within Phase 1 of the Plan.

This site and site SG2.4 are both safeguarded for post 2025 as longer term development opportunities. This phasing approach is considered appropriate and has been demonstrated under Issue 9.1. It is not proposed to amend the Phasing for this site. The proposals for sites identified in Phase 1 will provide a sustainable level of growth for the village.

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

Chelsea Healy (Ref 30/1), Steven Healy (Ref 31/3), Joyce Wallace (Ref 430/4), Stewart Milne Homes (Ref 500/12), Susan Mathers (Ref 490/4)

The supporting information submitted demonstrates the deliverability of the site. It is not viewed that the comments from Stewart Milne will prevent development occurring or that the site will impact upon the role and function of the Green Belt. Any potential traffic issues will be assessed through the preparation of a Development brief and planning application process. The representation identifies how the site will be suitably accessed. Development will not result in coalescence.

The site Evaluation process has been undertaken in a fair and consistent manner across all sites.

The site remains a suitable residential location.

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

(c.2) Policy SG2.3 Neilston Road, Neilston**Support**

Wallace Land (Ref 255/2) - Support for the allocation of the site is noted and welcomed.

Objection**Wallace Land (Ref 255/1, 255/4)**

The Council agrees with the representation regarding the phasing of this particular site and sees merit in allocating the site as a Phase 1 development opportunity. It was considered that development of the site could be restricted by phasing it over Phase 1 and 2 and early delivery of the site could assist with delivering regeneration objectives for Neilston and increasing the effective land supply. Other matters concerning Phasing are addressed under Issue 9.1: Housing Supply.

If the Reporter is so minded to recommend that the Representation from GL Hearn is accepted and the Plan modified, as set out below, the Council would be supportive of this modification because it would not have any implications for the LDP Strategy or other policies or proposals within the Plan.

Schedule 10 should be amended to read (additional text in italics):

Schedule 10: Distribution, Capacity and Phasing of Additions to the Housing land Supply

Site Ref	Location	HMA	Type	Notional Capacity #	Minimum Phase 1 Delivery by 2025 (Allocated land / Sites)		Phase 2 Delivery Post 2025 (safeguarded land / sites)	Notes
					2012-20	2020-25		
SG2.3	<i>Neilston Road, Neilston</i>	<i>LV</i>	<i>GF</i>	<i>150</i>	<i>100</i>	<i>50</i>	<i>0</i>	

Objection

E Hughes (Ref 5/1), John and Agnes Brown (Ref 43/1), Eleanor Milloy (Ref 285/1), Colin High (Ref 307/1), Davidina M Fox (Ref 336/2), Joyce Wallace (Ref 430/2), Susan Mathers (Ref 490/3), Neilston Development Trust (Ref 768/2), Neilston Community Council (Ref 894/3)

It is recognised that the submitted supporting information aims to address issues of landscape impact and design. A landscape framework is set out which seeks to address any potential issues of coalescence and to ensure there is no impact upon the adjacent Local Biodiversity Site (LBS) and to provide a robust long term settlement edge. This is key as the site has an important influence on settlement form and views in/out of Neilston. The changes in levels of the site do though mean that impact upon visual amenity is reduced.

Infrastructure, access and service provision can be addressed through the preparation of a Development brief and planning application process and as detailed above and could be mitigated through appropriate design.

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

SEPA (Ref 70/23)

SEPA raised concerns that an assessment of flood risk would be required. However, the site does not fall within or border SEPAs 1:200 flood maps. An area of flood risk is located further to the north of the site but does not impact upon the site.

The Council disagrees with the representation.

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

(c.3) Policy SG2.4 North Kirkton Road, Neilston**Objections****Mr and Mrs Colin Nicol (Ref 51/1), Joyce Wallace (Ref 430/3), Susan Mathers (Ref 490/2), Margaret and James Thomson (Ref 904/1)**

Traffic, access, archaeological and environmental issues can be addressed through the preparation of a Development brief and planning application process and as detailed above.

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

Dawn Homes (Ref 712/1, 712/2)

Support was provided for the allocation of site SG2.4, however it was stated that a larger site for 150 units in total should be allocated in the Plan.

This allocated site is safeguarded for development post 2025 for 78 units. The Council took the view through the site evaluation that the smaller parcel of land LDP60b was an appropriate scaled housing site that was contained within well defined boundaries and respected settlement form and field boundaries. It was viewed that the larger site LDP60a for 150 units that extended into the adjacent field could also be contained within well defined boundaries, however, did not reflect the existing settlement form as satisfactorily and on that basis was not accepted to be included within this site release.

The site Evaluation process has been undertaken in a fair and consistent manner across all sites.

It is recognised that the submitted supporting information aims to address issues of landscape impact.

It is recommended that this additional parcel of land continues to be allocated as Green Belt with the boundaries of site SG2.4 retained as shown in the Plan. Other sites have been identified in the Plan and village to meet housing needs up-to 2025 and beyond.

As there is no requirement to release additional sites the larger parcel of land site been rejected for inclusion as a housing proposal.

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

(c.4) LDP58/59 Nether Kirkton Farm**Objection****Mactaggart and Mickel/AWG Property Ltd (Ref 132/2)**

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10 to be Safeguarded and phased Post 2025.

This green field site lies to the eastern edge of Neilston and is bounded by Neilston Road, existing residential area with open fields beyond. The Landscape Character Assessment (LCA) (CD/45) identifies the Green belt landscape character as being of moderate - strong value. The site acts as a strong green gateway into/out of the area and has an important influence on the settlement character. Development would reduce the current rural quality and feel of the area although future development of site SG2.3 to the north of

Neilston Road would have to factored into any future landscape and visual assessments.

It is recognised that the submitted supporting information aims to address issues of landscape impact, access and design.

It is also accepted that a house builder is actively involved with the site. The representation states the site is effective and deliverable.

Site SG2.3 located to the North of Neilston Road has been allocated in the Plan as a preferred housing site. Landscaping is provided with this proposal to prevent issues of coalescence with Barrhead.

It is recommended that this site continues to be allocated as Green Belt. Other more sustainable sites have been identified in the Plan and village to meet housing needs up-to 2025 and beyond.

As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.

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

(c.5) LDP62B East Kingston Road

Objection

Elderslie Estates (Ref 983/5)

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

This green field site lies to the southern edge of Neilston and is bounded by Kingston Road, residential area with open fields beyond. The LCA identifies the Green belt landscape character as being of moderate value. The site acts as a strong green gateway into/out of the area and has an important influence on the settlement character. Development would reduce the current rural quality and feel of the area.

It is recognised that the submitted supporting information aims to address issues of landscape impact through increased woodland planting.

The effectiveness of the site has not been fully demonstrated and the Council is not aware of any active house builder interest in the site.

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 Plan and village to meet housing needs up-to 2025 and beyond.

As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.

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

(c.6) LDP66 Uplawmoor Road**Objections****Susie Stewart (Ref 408/3), Allan Stewart (Ref 621/1), Colin and Joanne Gardner (Ref 859/1), John and Elizabeth Proud (Ref 860/1), Janet Gordon (Ref 865/2), Jim Sheriff (Ref 892/1), Geraldine Warner (Ref 917/1), Marion Mould (Ref 918/1)**

The site evaluation methodology was revised to address accessibility issues raised by SPT (CD/10). This has been applied consistently across all sites with the scoring changed accordingly and also factoring in any new or additional information. The Council does not agree that this places these sites at increased risk of development. The Development Strategy as supported by the Rural Settlement Analysis (Appendix C of the Monitoring Statement) promotes the release of three green belt sites for development over a phased delivery schedule. No other sites were supported for release.

No modification to the Plan is required based upon the above.

Lynch Homes (Ref 965/5, 965/10)

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10 and requesting an amendment to Policy M8 criteria 2.

This green field site lies to the western edge of Neilston and is bounded by residential properties to the east, Uplawmoor Road to the South and other farmland and Lavern 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 LCA identifies the Green belt landscape character as being of strong value. The site acts as a strong green gateway into/out of the area and 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.

It is recognised that the submitted supporting information aims to address issues of landscape impact and design. Additional planting to improve the bio-diversity of the area, prevent negative impact upon the LBS and provide a stronger Green Belt boundary are proposed by the representee.

It is also accepted that a house builder is actively involved with the site. The representation states the site is effective and deliverable.

Planning application (2011/0824/TP) (CD/86) was refused by the Council and on appeal (PPA-220-2022) (CD/87) on 4th April 2013 on affordable housing grounds.

The Council is satisfied the scoring and site evaluation has been undertaken in a rational, fair and transparent manner at all plan stages.

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. However, the site is covered by a LBS designation and other sites have been identified in the Plan and village to meet housing needs up-to 2025 and beyond. It is recommended that this site continues to be

allocated as Green Belt.

As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.

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

(c.7) LDP86 Springfield Road

Objection

Elderslie Estates (Ref 983/6)

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

This green field site is bounded by railwayline, Springfield Road, existing residential area with open fields beyond. The LCA identifies the Green belt landscape character as being of moderate – strong value. Development would reduce the current rural quality and feel of the area.

It is recognised that the submitted supporting information aims to address issues of landscape impact through increased woodland planting.

The effectiveness of the site has not been fully demonstrated and the Council is not aware of any active house builder interest in the site.

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 Plan and village to meet housing needs up-to 2025 and beyond.

As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.

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

(c.8) Land at the corner of Double Hedges Road and Harelaw Avenue

Objection

Mohammed Siddique (Ref 982/1)

An objection was received regarding the non inclusion of the site as a preferred housing site.

This area of land is currently designated as protected urban greenspace under Policy D4 and forms part of the green network within the area. The Council does not wish to see this green resource lost to development. Other more sustainable sites have been identified in the Plan to meet housing needs.

There is no requirement to release this land as an additional housing site and no justification for the loss of this area of important urban greenspace. Strategic Policy 2 provides the policy framework to consider any future applications for development.

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

Reporter's conclusions:Policy M8: Concept and procedure

1. Policy M8 has two strands: firstly development within Neilston which is centred on an Infill Development Strategy, and, secondly, residential development at three peripheral locations.
2. There is support for the concept of regeneration but concern has been expressed that the overall level of development proposed is of too large a scale and will destroy the character of Neilston. Of particular concern in this respect is the loss of green belt to residential use and the proposed development at the Kingston playing field. The future of Crofthead Mill has also given rise to comments.
3. As a consequence of the scale of development it is feared that there would be shortcomings in the provision of infrastructure including educational facilities and traffic impacts. It is further claimed that coalescence would also result as a consequence of peripheral development. Indeed, the premise of need for additional housing has been questioned.
4. There has been some discussion as to the status of Neilston as a settlement. As explained by the council, the proposed plan describes Neilston as "a large village" although reference is also made to "The Neilston Renaissance *Town Charter*." I do not believe it is necessary or relevant to apply a particular status to Neilston as a settlement. What is clearly important to many of the residents is the retention of the existing character which, it is believed, is fundamental to those living in Neilston. I agree with the council that the terminology does not detract from the objectives of the policy. There is also much merit in the preservation and enhancement of a sense of place, a key objective of Scottish Planning Policy.
5. Policy M8 indicates that an Infill Development Strategy is to be prepared and this will be adopted as supplementary guidance. The council confirms that this process will involve community consultation and that it is intended to identify projects that are viable and deliverable. Examples of the matters likely to be considered include streetscape and frontage improvements, greenspace enhancements and transport and traffic movement, including accessibility throughout Neilston.
6. I consider the concept of the Infill Development Strategy for Neilston to be unexceptional. Indeed, the nature of the schemes envisaged has the potential to both protect and enhance character. I further believe the intended process of involving both the community and other interested parties in the preparation of the supplementary guidance is to be commended. Some concern has been expressed that the consultation exercise undertaken during the preparation of the proposed plan has not been adequate. There is no evidence to substantiate this claim or to lead me to think the preparation process has not been in accordance with the relevant regulations. In any event, the preparation of the supplementary guidance will provide an opportunity to be involved in the more detailed aspects of the strategy.
7. As indicated, two of the proposals listed in the first section of Policy M8 have been the subject of adverse representations: mixed use development at Crofthead Mill and the relocation of Neilston Juniors FC to the Kingston playing field along with associated development.

Crofthead Mill

8. In support of the argument that the development of site SG2.3, Neilston Road, should be brought forward, Wallace Land has questioned the effectiveness of the Crofthead Mill proposal. The Scottish Environment Protection Agency Flood Map shows much of the site to be within the 1:200 year Fluvial Extent and the Agency has drawn attention to the need for a flood risk assessment.

9. The council simply responds to the effect that Crofthead Mill is part of the established land supply and development is programmed for the long term. The council appears to accept that there may well be site development difficulties.

10. It is clear that the site suffers from significant constraints but, nevertheless, the mill is an impressive building and this is acknowledged in its listed status (Category B). The listing also reflects the importance of the building in the heritage of Neilston. On this basis, I agree that the restoration of Crofthead Mill should be included as a regeneration proposal in its own right within Policy M8 and included in Schedule 5 under D11.20. Protection under SG6.9 and SG6.19 in Schedules 12 and 13 respectively is also justified in recognition of the current business use.

11. Over the years, buildings similar to Crofthead Mill have been the subject of successful restoration. In this respect, Mr Graeme Orr has referred to the Anchor Mills in Paisley. There is no evidence to suggest that the site development constraints at Crofthead Mill, whilst significant and, no doubt, challenging, are not capable of being overcome. As the proposed development is long term (post 2025) I consider the reference to a mixed use development of housing and employment should not be retained in Policy M8 under its own bullet point. The restoration of Crofthead Mill should be presented as the primary regeneration objective with a reference to future uses including residential development post 2025. However, the site should remain within Schedule 8 under reference SG1.24 along with a note indicating the need for a flood risk assessment.

Brig o' Lee and Kingston playing field

12. Brig o' Lee, where Neilston Juniors Football Club have played for many years, is an established land use within the local community. However, as housing has been built to the west, the stadium is now somewhat incongruously located within this area of generally residential character. In this respect, a new, modern facility at an alternative location would no doubt be of general benefit. Indeed, I note the council refers to providing a permanent solution to the club's long-standing difficulties. A new stadium location would leave the current site available for housing, a compatible land use within the existing residential area. In undertaking this assessment, I have noted the concerns expressed about the terms under which the land was originally made available for the football club. Such matters are not normally relevant in planning and land use matters.

13. Under Policy M8, Neilston Juniors FC would be relocated to Kingston playing field, a large area of open space within the built-up fabric of Neilston. The new stadium would be part of what is described as a "sports/community" hub with some limited enabling residential development.

14. Despite being somewhat featureless, the area of open space is clearly regarded as being very important both in terms of the recreational activities it supports (both formal

and informal) and its central place within the built up area of Neilston. A high level of concern has been expressed about the potential loss or reduction of this area although there is also a measure of support for new development. It has been pointed out that the football ground requires security and this would, in itself, lead to a substantial reduction in the available space.

15. In my opinion, the Kingston playing field offers considerable scope for improvement, both visually and functionally. It is a large expanse within the built-up area but it is not a particularly attractive feature visually. The playing field is not as well integrated within the built up area as it might be. For instance, residential properties to the south-west have rear elevations to the open space, the railway line bounds the north-west, and whilst a limited number of houses look across Kingston Road to the playing field, there is a substantial boundary fence along the west side of the road. Much of the open space is more suited to informal recreational pursuits whereas more benefit might be derived from the provision of more formal facilities. I note that the council accepts the site is well used but that the opportunity exists to improve the facilities, usability and overall attractiveness. I agree that these are worthwhile objectives.

16. On the basis of the foregoing, I support the principle of the inclusion of the Kingston playing field within Policy M8 as an area with regeneration potential. The suggested relocation of Neilston Juniors appears to be a reasonable proposal which would accord with the concept of improving Neilston in general and the playing field in particular. I appreciate the need for a secure pitch and associated facilities but it is clear that a modest stadium would suffice. I therefore think that the open space would be capable of absorbing a new football facility. I can also understand that reference to the provision of other recreational facilities and “limited enabling residential development” has given rise to concern, particularly as no detailed or indicative layout has been submitted. Indeed, the council states that there are no firm proposals and hence the proposals map illustrates the future intended land use by means of symbols.

17. Similarly, the council has stated in this response form that “Capacity for any enabling development, if required, is still to be determined”. This casts doubt on not only the capacity but also the very need for any such enabling development.

18. I believe that, in addition to the football stadium, careful design could demonstrate that the Kingston playing field could accommodate a range of recreational facilities as envisaged in the regeneration programme. It may be that a more efficient layout could be provided if the various facilities, including the pitch for Neilston Juniors, could be contained within a single “hub”. Accordingly, the proposal should be retained within Policy M8 although the reference to residential development should be qualified to reflect the uncertainty surrounding this element.

19. Although some have opposed the concept of recreational development at the Kingston playing field, I consider that the playing field is well located and is accessible by a variety of transport modes. This would be a significant benefit.

20. I have noted the suggested amendment by the Neilston Development Trust but, whilst in more general terms, there is no requirement to repeat the reference to collaboration with interested parties as this is already stated in the second paragraph of the policy.

The principle of proposed green belt release for housing

21. Housing land supply in a wider context has been examined under Issues 2.1.1, 2.1.2 and 9.1. Although it is concluded that the proposed plan provides considerably in excess of the strategic development plan, Scottish Planning Policy requires the identification of a generous supply of land for each housing market area. Additionally, it is important to identify a range of sites and the council explains that the proposed sites under Policy M8 have been identified to meet the needs in Neilston over the plan period and beyond. Accordingly, whilst the proposed plan provides considerably in excess of the strategic development plan requirement, I am satisfied that the council's new allocations are in the spirit of providing a generous supply and providing a choice of sites and locations.

22. The three sites involving green belt release in Neilston have been subject to site evaluation, strategic environmental assessment and green belt review. As there is no compelling evidence to lead me to believe that the housing land allocations are excessive I am unable to conclude that they should be deleted.

23. It has been suggested that the level of housing proposed would destroy the character of Neilston. However, I note there has been substantial residential development over the years and, judging by the terms of many representations, the definable character has been retained. The phasing of the three sites in the proposed plan is, for the most part, post 2025. Although the council has suggested a modification in respect of Neilston Road, the two remaining sites are phased beyond 2025. In my opinion, the time period proposed for the development of these sites is such that the character of Neilston would not be overwhelmed. I believe that the rate of development is likely to be such that Neilston would be able to absorb the increased population without a sudden or severe impact on character.

24. Despite concerns about coalescence, as explained, the council has undertaken a green belt review and this has not suggested that the development of these sites would have this undesirable result.

25. Sites SG2.2, Holehouse Brae, and SG2.4, North Kirkton Road would extend the boundary of the built-up area but not in directions that would narrow the gap between Neilston and other settlements.

26. The development of site SG2.3, Neilston Road, would lead to encroachment within the sensitive gap between Neilston and Barrhaed. However, new houses would not extend significantly beyond existing development to the south of Neilston Road and, in any event, there is also development to the east of site SG2.3 at Downies Brae. The western and eastern sections and the northern periphery of site SG2.3 are protected as urban greenspace within the green network and also fall within Schedule 1 as part of a local biodiversity site. Although I recognise that the allocation of site SG2.3 represents the loss of green belt land, I believe that the construction of houses on the site would retain the character of Neilston and would not represent or threaten coalescence with neighbouring Barrhead. At present the green belt boundary to the east of Gleniffer Way is distinct but not robust. The development of site SG2.3 would provide the opportunity to create a more robust boundary.

27. Although concern has been expressed about the inability of infrastructure, including traffic and educational impacts, to cope with the level of development proposed, the council has explained that service providers have raised no significant issues. It is

necessary to attach weight to the views of those providing supporting infrastructure. In any event, adds the council, cross funding contributions from green belt release sites may, if appropriate, assist in the delivery of other proposals. Paragraph 4.17.3 confirms this approach and also indicates that development contributions could assist with providing infrastructure improvements and delivering the infill strategy.

28. All in all, I consider that, in principle, the release of green belt land for additional housing is justified and, indeed, could benefit the implementation of the Neilston regeneration process.

Site SG2.2, Holehouse Brae

29. Although it has been suggested that the development of the site would not provide a robust green belt boundary, I do not believe that the land currently makes a significant contribution to green belt objectives. Housing could provide the opportunity to provide a clearer definition to the edge of the built up area at this location.

30. It has been claimed that the site has recreational value. I appreciate that land with limited agricultural value on the edge of settlements is often used informally for recreational purposes. Such use might be locally valued but I do not think this consideration should over-ride the proposed residential allocation. Reference has also been made to technical constraints, including the difficulty in providing an access. I accept that the development of the site could be challenging. However, I note the indicative layout prepared by Mactaggart and Mickel and AWG Property Ltd demonstrates that it would be possible to achieve a development taking account of the contours and providing an access on to Holehouse Brae.

31. Whilst I appreciate the potential for the early development of site SG2.2, the conclusions under Issues 2.1.1, 2.1.2 and 9.1 find that adequate housing land has been provided in line with the requirements set out in the strategic development plan. Taking account, also, of the situation in Neilston, where there is already adequate provision in the shorter term, I agree that the phasing of the development of the land at Holehouse Brae should remain "post 2025". Policy SG3 on phasing of new housing development would permit the release of safeguarded land before 2025 if necessary to maintain a 5 year housing land supply.

Site SG2.3, Neilston Road

32. I have previously concluded that the principle of development is acceptable at Neilston Road in terms of wider housing land supply, loss of green belt land and infrastructure considerations.

33. I have noted the concern in respect of the feared impact on wild life but no nature conservation designations apply to the site. In any event, as already explained, much of the site is protected as part of the green network and urban greenspace. That part of the land is also within a local biodiversity site.

34. Matters related to site layout and design have also been raised but these are aspects of the development to be addressed when detailed proposals are being prepared by means of a development brief or through a planning application. I have no reason to doubt that a suitable layout and design could be achieved. Although the Scottish Environment Protection Agency has drawn attention to the need for a flood risk

assessment, the Flood Map shows, at worst, a very small part of the area might be affected by a 1:200 year Fluvial Extent. Indeed, it appears that the area involved is the northern part of the site and not within the section proposed for development. I therefore believe that normal application of the general policies of the plan should suffice.

35. Development phasing in Policy M8 indicates 60 houses by 2025 and the remaining 90 houses post 2025. Wallace Land has explained that the land is effective in terms of Planning Advice Note 2/2010 and therefore the site should be made available for development immediately. A total of 150 units could be brought forward between 2014 and 2025 at a rate of about 20-30 houses a year.

36. The council agrees with the representation and has suggested a modification whereby the site would be developed over the period 2012-2025 (Phase 1) with 100 houses in the period 2012-20 and 50 houses 2020-25. This, believes the council, could assist with delivering regeneration objectives for Neilston and would also increase the effective land supply.

37. I have concluded that the site is acceptable in principle and agreed that there are no insurmountable technical constraints. I also acknowledge the council's hope that development of the site could assist in the implementation of the wider regeneration objectives for Neilston although it has not been indicated how this would be achieved.

38. Whilst I appreciate the potential for the early development of site SG2.3, the conclusions under Issues 2.1.1, 2.1.2 and 9.1 find that adequate housing land has been provided in line with the requirements set out in the strategic development plan. Taking account, also, of the situation in Neilston, where there is already adequate provision in the shorter term, I find that the phasing of the development of the land at Neilston Road should remain as indicated in Policy M8. Policy SG3 on phasing of new housing development would permit the release of safeguarded land before 2025 if necessary to maintain a 5 year housing land supply.

Site SG2.4, North Kirkton Road

39. This is a further site where I have previously concluded that the principle of development is acceptable in terms of the wider housing land supply, loss of green belt land and infrastructure considerations.

40. I have noted the concern in respect of the feared impact on wild life but no nature conservation designations apply to the site and I have no reason to believe that special protective measures are required.

41. Reference is also made to the standing stone located in the western part of the site but this does not appear to be a scheduled monument (it is not included in Schedule 4) and no details have been provided of any inherent archaeological or historic importance.

42. Despite concern about access, I am satisfied that this and other issues can be addressed through the preparation of a development brief and planning application.

43. Overall I am satisfied that the site does not display technical and environmental constraints that would render development unachievable and I conclude that the allocation in the proposed plan should remain.

The principle of the release of additional land for housing

44. Three housing sites have been proposed by the council involving the release of land currently designated as green belt. Two of these sites are phased for development in the period post 2025 whilst 60% of the third site is also post 2025. Paragraphs 29-43 deal with my assessment of these sites and my conclusion is that the allocation of each of them is justified.

45. A number of sites not allocated for development in the proposed plan have also been brought forward for housing by third parties. For the most part these sites lie within the designated green belt. As has been explained previously, the conclusions under Issues 2.1.1, 2.1.2 and 9.1 find that the overall vision and development strategy of the proposed plan is appropriate and that adequate housing land has been provided in line with the requirements set out in the strategic development plan. The proposed plan provides considerably in excess of the strategic development plan requirement for private housing. Accordingly, there is no numerical justification to allocate further sites for private housing.

46. On this basis there is a clear presumption against the further allocation of green belt land adjacent to Neilston for residential development. Nevertheless it is necessary to consider the characteristics of the various proposed sites.

Site LDP60a, North Kirkton Road

47. This site would extend site SG2.4, which is considered above, further east.

48. I agree with the council that site SG2.4 can be regarded as a reasonable planning unit and provides scope for a development which respects the settlement scale. In this respect therefore, the release of site SG2.4 can be regarded as justified. Should a shortfall of land for housing have been identified, either in a strategic sense or in terms of Neilston as a settlement, there may well have been a case for promoting site LDP60a. However, as explained, the housing land supply is such that there is not a strategic requirement for additional sites or a need within Neilston itself. In turn, there is no justification for allocating this site for housing within the proposed plan.

Site LDP62B, East Kingston Road

49. I consider that the existing development on the eastern side of Kingston Road brings this part of Neilston to a satisfactory boundary. Existing beech trees in the northern part of site LPD62B augment the boundary. The configuration of site LPD62B would lead to its inclusion within the settlement boundary being seen as a contrived addition. It is difficult to envisage a suitable development layout taking into account the beech trees in the northern part of the site and the high voltage overhead power line to the south. All-in-all, there would be no merit in the allocation of the site for residential development.

Site LDP 66, Uplawmoor Road

50. I agree with the council that the western part of the site has greater green belt merit. This section has a higher visual profile when both leaving and approaching Neilston. I also note the local biodiversity site designation across the entire site. The plan glossary defines such sites as “a site generally identified by the local authority which warrants special protection because of its local importance for flora and fauna.” Whilst details of the site have not been provided, it is clear that the land is of some biodiversity value.

Policy D8 indicates a strong presumption against development where it would compromise such sites.

51. I have noted the concern of a number of local residents – particularly in respect of the revised evaluation undertaken. The council has stated that the process was undertaken on a consistent basis and that, in any event, the outcome at this location does not suggest a higher likelihood of development. I consider that the evaluation process is of assistance for site comparison purposes but, at the end of the day, a judgement must be made as to whether any particular land use – in this case, housing – is suitable for the site. In my judgement, the site is not appropriate for residential use.

52. All-in-all I consider that the western part of the site has a green belt role which points to the land not being allocated for residential development. The eastern section of the site is less important in this respect but nevertheless lies within the setting of Neilston. Taking account of the local biodiversity designation and the wider housing land situation, I conclude that this part of the site should also remain in the green belt.

Sites LDP58 & 59, Nether Kirkton Farm

53. I accept that, if allocated, the site could be regarded as effective, particularly in respect of there being a willing house-builder involved. However, I do not agree that development would naturally round-off Neilston. The scale of the proposal is simply too large to be regarded as such. I share the council's opinion that the site has an important influence on settlement character. The land is prominent, rising up from Neilston Road, especially when approaching from Barrhead to the east. In turn, I believe the impact on both landscape character and visually that would result from the residential development of the site would be significantly adverse.

54. Taking into account both the wider housing land supply assessment and the situation in Neilston I conclude that the allocation of the land at Nether Kirkton Farm is not justified.

Site LDP86, Springfield Road

55. I consider that the houses adjacent to the western boundary of the site provide a clear green belt boundary in both visual and physical terms. Housing development of site LPD86 would not represent the natural or organic growth of Neilston. I agree with the council that there would be an adverse impact on landscape character and the topography of the site would impose a significant visual impact. Notwithstanding doubts about the effectiveness of the site, allocation for housing development is not justified.

Land at Double Hedges Road and Harelaw Avenue

56. This site is within the built up area of Neilston. The land is a maintained grassed rectangle at the junction of Double Hedges Road and Harelaw Avenue, sloping down from both roads although more steeply from the former. The proposals map shows the land to be part of the green network under Policy D4 and protected green space under Policy D5.

57. As Mr Siddique points out, the site lies within an area of residential character. However, the land cannot be compared with a domestic garden in terms of either scale or function.

58. Functionally, the open space provides a link within the green network extending to the west along the former railway line and, to the east, towards the Kingston playing field. All these areas are protected urban greenspace. Visually, this link is also important in providing continuity in the network. Allocation as a site for housing would lead to the destruction of both the function and visual value of the open space both locally and within a wider context. I therefore conclude that the designation in the proposed plan should be retained.

Reporter's recommendations:

I recommend that the following modifications be made:

1. In Policy M8: Neilston Village Regeneration, sub-section 1,

Delete bullet point 4: "Mixed use development of housing and employment..."

Amend bullet point 5 as follows: "Restoration of Crofthead Mill (Policy D11 and Schedule 5) with the potential for a mixed use development of housing and employment focussed on the mill buildings (200 units phased post 2025);"

2. In Schedule 8, SG1.24, after Crofthead Mill insert "**"

3. At the foot of Schedule 8 insert "* Development proposals will require to be subject to a flood risk assessment."

4. In Policy M8, amend bullet point 8 as follows:

"Relocation of Neilston Juniors Football Club to Kingston Playing Field with the redevelopment of the Brig o' Lee football ground for residential development of approximately 35 homes phased by 2025. The possibility of incorporating the new stadium within a wider sports/community hub at Kingston playing field will be explored. Depending on the scale of proposals, there may be some limited scope for enabling residential development."

Issue 4	GREEN BELT	
Development plan reference:	Policy D3: Green Belt and Countryside Around Towns	Reporter: Dilwyn Thomas
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Scottish Parliament (Ref 25/3) Philip C Smith (Ref 78/1) Wallace Land Investment and Management (Ref 331/4) CALA Homes (West) and Paterson Partners (Ref 414/5) Andrew Gray (Ref 501/3) Nazir Ahmed (Ref 755/13) Lynch Homes (Ref 965/1) Elderslie Estates (Ref 983/2)</p>		
Provision of the development plan to which the issue relates:	Chapter 5: Placemaking and Design Para. 5.5-5.7.5	
Planning authority's summary of the representation(s):		
<p><u>Policy D3: Green Belt and Countryside Around Towns</u></p> <p><u>Support</u></p> <p><u>Andrew Gray (Ref 501/3)</u> Support plans to preserve the Green Belt Will help support birds Will help Internationally Protected Species and other wildlife Will help protect Humbie Road GSO created displacement and loss of habitat this will help preserve and protect what exists Will protect Newton Mearns from sporadic development and allow residents east access to the countryside without having to drive</p> <p><u>Nazir Ahmed (Ref 755/13)</u> - Support policy</p> <p><u>Elderslie Estates (Ref 983/2)</u> - Support policy</p> <p><u>Wallace Land Investment and Management (Ref 331/4)</u> - Support repositioned Green Belt south of Barrhead to accommodate growth – (Policy M2.2).</p> <p><u>Objection</u></p> <p><u>Scottish Parliament (Ref 25/3)</u> - Green spaces including the Green Belt are important for community use and should not be burdened with buildings as seen with Waterfoot Park. What protections are available for green spaces in the future if further incursions could be done by simply recalibrating the Green Belt boundaries?</p>		

Philip C Smith (Ref 78/1)

ERC no differentiation between Green Belt and Countryside around Towns and has therefore a presumption against development in both not just Green Belt. This is against SPP in Para 94 which requires Development Plans to allocate 'a generous supply in ..rural..areas' and 'support opportunities small scale housing in all rural areas' Green Belt policies are being applied to countryside uses contrary to SPP Para 94 Neighbouring council areas differentiate between Green Belt and countryside policy areas.

CALA Homes (West) and Paterson Partners (Ref 414/5) - Review of Green Belt has not been made available for consultation, has not been possible to analyse rational CALA have prepared a Green Belt review which shows the Green Belt around Eaglesham can be repositioned to accommodate growth

Lynch Homes (Ref 965/1)

Green Belt review not presented for consultation

As per SPP Green Belt boundaries should not be drawn tight around settlements and should reflect long term strategies

Green Belt Review and Impact Assessment undertaken by Geddes Consulting for Lynch Homes undertaken

Modifications sought by those submitting representations:

Philip C Smith (Ref 78/1) - Plan should adopt a similar approach to neighbouring councils on non-urban housing procedure outwith Green Belt area and take a different policy stance on Countryside Around Towns.

CALA Homes (West) and Paterson Partners (Ref 414/5)

Green Belt boundary review should be made available.

Green Belt around Eaglesham should be repositioned to accommodate growth.

Lynch Homes (Ref 965/1)

Green Belt boundary review should be made available.

Green Belt around Neilston should be repositioned to accommodate growth.

Green Belt boundaries should not be drawn tight around settlements and should reflect long term strategies.

Summary of responses (including reasons) by planning authority:**Policy D3: Green Belt and Countryside Around Towns****Support****Andrew Gray (Ref 501/3), Nazir Ahmed (Ref 755/13), Elderslie Estates (Ref 983/2)** -

The Council acknowledges and welcomes the support for Policy D3.

Wallace Land Investment and Management (Ref 331/4) - Support for the repositioned Green Belt to the south of Barrhead to accommodate growth is welcomed. This site is discussed in detail under Issue 3.4.

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

Objections

Scottish Parliament (Ref 25/3), Philip C Smith (Ref 78/1), CALA Homes (West) and Paterson Partners (Ref 414/5), Lynch Homes (Ref 965/1) - The importance and role of the Green Belt is a key component of the Approved Strategic Development Plan (SDP) (CD/81) as documented in Strategic Support Measure 8. The SDP states that the LDPs should identify the inner and outer boundaries of the Green Belt as a priority.

An updated review of the Green Belt Boundary utilising the principles in SPP (Para 159, 161 and 163 refer) was undertaken to inform preparation of the Proposed Plan and to meet the housing requirements of the SDP. In reviewing the green belt boundaries, the Council also considered a timescale beyond the length of the plan, i.e. beyond 2025 to ensure a longer term approach was undertaken to direct development to preferred locations and to provide a defence to unplanned growth. This process has resulted in a boundary which is considered to be robust, defensible and fit for purpose and is documented in Appendix D1 of the Monitoring Statement.

This review process together with the Site Evaluation and SEA informed which areas/sites should be released to meet the SDP requirements as part of the Development Strategy. The site selection process is set out in Para 1.6-1.6.6 of Appendix D1 and covered issues such as landscape and visual sensitivity, coalescence and long term integrity of the Green Belt.

The Council maintains that this Plan makes adequate provision for housing including affordable housing through the provision of a generous supply of land for housing and no additional releases are required. It is not recommended that this boundary requires any further modification. Sites have been released adjacent to the main urban areas and at the village of Neilston. A Rural Settlement analysis is set out in Appendix C of the Monitoring Statement. It is viewed that the approach for the rural settlements is appropriate to deliver sustainable levels of growth, provide a range and choice of sites and opportunities and not undermine the overall Development Strategy. This approach to development in the rural settlements accords with the requirements of SPP.

It is viewed that Policy D3 and its supporting SPG and Strategic Policy 2 provide a suitable policy framework for considering new development proposals in the Green Belt or Countryside Around Towns (CAT) areas, subject to compliance with a range of criteria. The policy aims to prevent sporadic development in these locations. Any development must be sympathetic in scale and design to its rural location and surrounding landscape character.

In preparing the Plan a new criteria was also added to Strategic Policy 2, criteria 8 that requires proposals to provide a defensible green belt boundary. This criteria is a key requirement for all new proposals in the Green Belt to prevent urban sprawl and further loss of Green Belt.

The Green Network under Policy D4 incorporates various components including greenspace and riparian routes associated with rivers etc. Whilst the green network designation does not preclude development, it seeks to ensure that development is designed in a manner which incorporates the key components of a functioning green network. Proposals will be expected to reflect the guidance contained within Supplementary planning Guidance: Green Network & Environmental Management (Dec 2012).

The Plan provides the appropriate policy framework to protect green spaces and green belts from unplanned development.

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

Reporter's conclusions:

1. Policy D3 in the proposed plan states:

“5.6 Policy D3: Green belt and countryside around towns

5.6.1 Development in the green belt and countryside around towns as defined in the proposals map, will be strictly controlled and limited to that which is required and is appropriate for a rural location and which respects the character of the area.

5.6.2 Where planning permission is sought for development proposals, within the green belt or countryside around towns and these are related to agriculture, forestry, outdoor recreation, renewable energy and other uses appropriate to the rural area, the council will consider them sympathetically subject to compliance with other relevant policies of the proposed plan. Any decision will, however, take into consideration the impact the proposals will have on the function of the green belt and countryside around towns and the viability of important agricultural land. Development must be sympathetic in scale and design to the rural location and landscape.

5.6.3 Further detailed information and guidance is provided in the rural development guidance supplementary planning guidance.”

2. The supporting text in the local development plan for Policy D3 is set out at paragraph 5.5.1, and the proposals map shows the areas covered by the green belt and countryside around towns designations. Further text on the green belt is set out at paragraphs 3.2.1-3.2.3.

3. Adjustments are sought to the proposed plan which would: confirm that green spaces, including the green belt, are important, and ensure that they are retained through providing appropriate protections; and apply a less restrictive approach in the countryside around towns designation to encourage rural regeneration. Additionally, concern was expressed that the review of the green belt had not been out to public consultation. The planning authority proposes no change to the plan.

4. The 2010 Scottish Planning Policy and Scottish Planning Policy (2014) indicate that the purposes of the green belt are to direct planned growth to the most appropriate locations and support regeneration, to protect and enhance the character, landscape setting and identity of towns, and to protect and provide access to open space. They seek to promote a pattern of development in the rural area that is appropriate to its character and the challenges it faces, and to encourage rural development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality. In the pressurised and accessible rural areas, they aim to protect against an unsustainable growth in long distance car based commuting and suburbanisation of the countryside, and support the provision of most new urban development within, or in planned extensions to, existing settlements.

5. Policy D3 deals with development in both the green belt and wider rural area, setting out the circumstances in which it may be allowed. Table 2 of the proposed plan highlights themes of safeguarding the most environmentally and sensitive areas of green belt and countryside, and ensuring any green belt releases provide a strong defensible green belt boundary. In supporting the green belt and generally directing development not requiring a countryside location to settlements, Policy D3 is consistent with the strategic development strategy of the Glasgow and Clyde Valley Strategic Development Plan.

6. The proposed plan recognises the importance of the green belt designation. Strategic Policy 1 seeks to protect and enhance the green belt and countryside around towns designations. Strategic Policy 2 applies a sequential approach to new development, which prioritises brownfield sites in the urban area, then greenfield land in the urban area, and finally land adjacent to the urban area. It also indicates 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. At Issue 2.1.2, a requirement for planned green belt release is identified. Green belt boundaries can appropriately be reviewed as a part of devising a spatial strategy in a local development plan. In carrying out such a review, the planning authority has reasonably looked at a timescale beyond 2025, which will help the green belt boundaries in the proposed plan to endure. For development proposals in the green belt that are not included in the spatial strategy, I am satisfied that Policy D3, in combination with Strategic Policies 1 and 2, provides a suitable framework for controlling development.

7. I do not share the concern expressed about the lack of public consultation on the review of the green belt. The review contributed to the spatial strategy of the proposed plan, which has been the subject of public consultation. At the same time, the planning authority consulted on a number of associated documents, including the monitoring statement, which contains a section headed green belt review. In the circumstances, I consider that there has been a reasonable opportunity to comment on the review as set out in the monitoring statement, and to promote alternative green belt boundaries and development sites from those proposed in the plan. I note that several alternative green belt sites have been considered for development at this examination, along with the sites included in the spatial strategy.

8. The countryside around towns designation in East Renfrewshire covers a smaller area than the green belt (32.8%, compared to 52%, of the plan area). The restrictive approach in Policy D3 to housing development in the countryside area as a whole is justified because the plan area is easily accessible from the built-up areas to the north (Glasgow) and south (the Ayrshire towns), and is subject to ongoing development pressures. I am satisfied that the approach in Policy D3, along with other policies, is appropriate for assessing development proposals throughout the rural area, and that it reflects the thrust of Scottish Planning Policy (2014). I am not persuaded that a less restrictive approach has been justified in the countryside around towns designation. A more detailed framework for assessing residential development proposals is proposed in supplementary planning guidance. It sets out a number of detailed criteria which residential proposals in the green belt and countryside around towns designations should meet. These include one relating to building groups. It is unnecessary for the planning authority to include such detail in Policy D3.

9. No adjustment is required to the proposed plan.

Reporter's recommendations:

No modifications.

Issue 4.1	GREEN NETWORK AND NATURAL ENVIRONMENT	
Development plan reference:	Policy D4: Green Network Policy D5: Protection of Urban Greenspace Policy D6: Protection of Local Urban Greenspace Policy D7: Green Infrastructure and Open Space Provision within New Development Policy D8: Natural Features	Reporter: Dilwyn Thomas
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Charles Murray (Ref 65/4) Kenneth Wharton (Ref 75/2) Scottish Natural Heritage (Ref 88/9) (Ref 88/10) (Ref 88/11) Margaret Gray (Ref 231/1) RSPB Scotland, South and West Region (Ref 280/6) (Ref 280/7) (Ref 280/8) (Ref 280/9) Roger Spooner (Ref 387/1) Claire Wharton (Ref 419/7) Andrew Gray (Ref 501/2) James Sandeman (Ref 600/4) Sport Scotland (Ref 702/1) (Ref 702/2) Persimmon Homes Ltd (Ref 743/10) Nazir Ahmed (Ref 755/14) (Ref 755/15) (Ref755/16) Homes for Scotland (Ref 758/5) Lynch Homes (Ref 965/2) (Ref 965/3) Elderslie Estates (Ref 983/3)</p>		
Provision of the development plan to which the issue relates:	Chapter 5: Placemaking and Design Para. 5.7-5.12.4 Para 3.7.1	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy D4: Green Network</u></p> <p><u>Support</u></p> <p><u>Scottish Natural Heritage (Ref 88/9)</u> - We strongly support Policy D4: Green Network and particularly welcome that “The provision of the green network will be a core component of any master plan. “.</p> <p><u>Margaret Gray (Ref 231/1)</u> Pleased with emphasis on protecting and enhancing the environment and continued protection of the Green Belt. Signing up to National initiative of the Green Network will help to promote a healthier lifestyle for residents of ER and a nurturing environment for biodiversity. As a resident of Newton Mearns, happy to support ERC's plans to preserve the Green Belt for the following reasons: Birds, animals - Humber Road since creation of GSO this is a haven for walkers, nature</p>		

lovers and cyclists.

Adoption of the LDP would mean that Green Belt is preserved in the area where wildlife has been displaced by the GSO.

The Green Network if adopted would mean residents would not have to drive to access Dams to Darnley and would protect and enhance Newton Mearns and preserve it from sporadic development.

RSPB Scotland, South and West Region (Ref 280/6) - Particularly welcome emphasis on enhancing Green Network rather than just protecting.

Andrew Gray (Ref 501/2) - Agree to safeguard and reinforce Green Belt land. It will help promote healthier lifestyles and create a nurturing environment for biodiversity.

Sport Scotland (Ref 702/1) - SPG confirms Country Parks are defined as core/hubs in Green Network and protected through policy.

Nazir Ahmed (Ref 755/14) - Support policy

Elderslie Estates (Ref 983/3) - Support policy

Objections

Kenneth Wharton (Ref 75/2)

Should be clear Green Network policy does not stand on its own and can only be used in conjunction with policies D3, D5 and D8

Green Network policy is supplementary to existing protection of green space policies

All land defined as Green Network is already Green Belt, Urban greenspace or a natural feature

Two separate policies applying to the same bit of land is confusing

Should be sub category of Green Belt, Urban greenspace or a natural feature

Claire Wharton (Ref 419/7)

Policy should be clarified to make clear it can only be used in conjunction with policies D3, D5 and D8 Green Network areas are always also designated as Green Belt, urban greenspace or a natural feature which causes confusion

D4 should be amended to a sub section of other policies to avoid confusion

James Sandeman (Ref 600/4) - Para 3.7.1 Should not be used for drainage as often polluted

Lynch Homes (Ref 965/2)

Enhancement of other areas of Green Network should only be necessary where a new development does not enhance objectives of Green Network

Housing development can enhance Green Network providing open space etc

Support subject to clarity of above

(b) Policy D5: Protection of Urban Greenspace

Support

RSPB Scotland, South and West Region (Ref 280/7) - Support policy

Objections**Charles Murray (Ref 65/4)**

Proposals on Capelrig Road and Fruin Avenue go against this policy.
Council disingenuous.

Sport Scotland (Ref 702/2)

Support playing fields protection, however policy does not consider all aspects listed in para 156 of SPP and does not provide appropriate policy protection for formal sports playing fields.

Support temporary greening - however stalled spaced policy would be useful to protect in the long term, sites through the stalled spaces approach that become popular and important resources for sport (where council is land owner).

(c) Policy D6: Protection of Local Urban Greenspace**Support**

Nazir Ahmed (Ref 755/15) - Support policy

(d) Policy D7: Green Infrastructure and Open Space Provision within New Development**Support**

Scottish Natural Heritage (Ref 88/10) - We strongly support Policy D7: Green Infrastructure and Open Space Provision within New Development which we believe will help deliver good place making in East Renfrewshire

Nazir Ahmed (Ref 755/16) - Support policy

Objection

South and West Region (Ref 280/8) - Wish to see the policy incorporate biodiversity and suggest the following revised wording:

'Policy D7: Green Infrastructure and Open Space Provision within New Development
5.11.1. New development proposals should incorporate a range of green infrastructure including open space provision, multi use access, sustainable urban drainage, wildlife habitat and landscaping. This infrastructure should not only form an integral part of the proposed scheme but should complement its surrounding environment.'

Persimmon Homes Ltd (Ref 743/10) - This policy should clarify that developer requirements to provide open space should be justified by a clear strategy and standards for the provision, as well as an understanding of existing provision/deficiencies as opposed to being required in every instance.

Homes for Scotland (Ref 758/5)

This policy does not accord with Scottish Planning Policy. SPP is clear that greenspace and open space provision should be determined with reference to an open space audit and strategy.

The Plan should identify assets to be protected; identify opportunities for new assets; set out (probably in Supplementary Guidance) the standards which apply, and identify areas

of deficiency against those standards.

(e) Policy D8: Natural Features

Support

Scottish Natural Heritage (Ref 88/11) - We strongly support Policy D8: Natural Features and welcome the protection given to protected areas and protected

Roger Spooner (Ref 387/1) - Support policy

Objections

RSPB Scotland, South and West Region (Ref 280/9) - General support for policy, however, does not reflect the specific protection given to SSSIs. Suggest revise wording

Lynch Homes (Ref 965/3) - Remove LBS designation from site subject to 2011/0824/TP planning application - LDP66

Modifications sought by those submitting representations:

(a) Policy D4: Green Network

Kenneth Wharton (Ref 75/2)

Should be clear Green Network policy does not stand on its own and can only be used in conjunction with policies D3, D5 and D8.

Should be sub category of Green Belt, Urban greenspace or a natural feature.

Claire Wharton (Ref 419/7)

Policy should be clarified to make clear it can only be used in conjunction with policies D3, D5 and D8

D4 should be amended to a sub section of other policies to avoid confusion

Bob Salter, Geddes Consulting Limited on behalf of Lynch Homes (Ref 965/2)

Plan should recognise that housing development can enhance Green Network providing open space etc

(b) Policy D5: Protection of Urban Greenspace

Sport Scotland (Ref 702/2) - Add criteria from SPP para 156.

(d) Policy D7: Green Infrastructure and Open Space Provision within New Development

RSPB Scotland, South and West Region (Ref 280/8)

Revised wording -

'Policy D7: Green Infrastructure and Open Space Provision within New Development
5.11.1. New development proposals should incorporate a range of green infrastructure including open space provision, multi use access, sustainable urban drainage, wildlife habitat and landscaping. This infrastructure should not only form an integral part of the proposed scheme but should complement its surrounding environment.'

Persimmon Homes Ltd (Ref 743/10), Homes for Scotland (Ref 758/5)

5.11.1 should be re-written:

“New development proposals should be served by a range of green infrastructure including open space provision, multi-use access, sustainable urban drainage and landscaping in accordance with local standards of provision. These standards are detailed in the Green Network and Environmental Management Supplementary Planning Guidance. Where a development is not adequately served, then the developer should incorporate new provision within the development, or contribute to the upgrading of existing provision which would be capable of serving the development.”

(e) Policy D8: Natural Features

Toby Wilson, RSPB Scotland, South and West Region (Ref 280/9)

Revised wording -

‘5.12.1. There will be a strong presumption against development where it would compromise the overall integrity of Local Biodiversity Sites, Tree Preservation Orders and ancient and long established woodland sites. Development that affects a SSSI will only be permitted where:

- It will not adversely affect the integrity of the area or the qualities for which it has been designated.
- Any such adverse effects are clearly outweighed by social, environmental or economic benefits of national importance.

The location of Sites of Special Scientific Interest, Local Biodiversity Sites and Tree Preservation Orders are identified on the Proposals Map and referred to under Schedule 1.’

Lynch Homes (Ref 965/3) - Remove LBS designation from site subject to 2011/0824/TP planning application - LDP66

Summary of responses (including reasons) by planning authority:**(a) Policy D4: Green Network****Support**

Scottish Natural Heritage (Ref 88/9), Margaret Gray (Ref 231/1), RSPB Scotland, South and West Region (Ref 280/6), Andrew Gray (Ref 501/2), Sport Scotland (Ref 702/1), Nazir Ahmed (Ref 755/14), Elderslie Estates (Ref 983/3),

The Council acknowledges and welcomes the support for Policy D4.

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

Acknowledge and welcome support for Policy D4.

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

Objections

Kenneth Wharton (Ref 75/2), Claire Wharton (Ref 419/7), Lynch Homes (Ref 965/2)

The role of the green network is to deliver environmental, economic and social benefits through the provision of sites which are of wildlife, recreational, landscape and access value.

Policy D4: Green Network is a distinct Policy which can have numerous overlapping policy designations. The green network is not exclusively a combination of greenbelt, urban greenspace, or natural features and to attempt to depict it in that manner would be inaccurate. The term is enshrined within SPP which advises Development Plans to identify and promote green networks. The Green Network under Policy D4 incorporates various components including greenspace and riparian routes associated with rivers, landscaping tracts within developments, buffer zones along urban fringe. These concepts are comprehensively dealt with within Proposed Supplementary Planning Guidance: Green Network & Environmental Management (Dec 2012).

Removal of Policy D4 and enshrining the concept within other policy designations such as Greenbelt (Policy D3), urban Greenspace (Policy D5, D6) or natural features (Policy D8), is not a feasible option.

The green network designation does not preclude development, it seeks to ensure that development is designed in a manner which incorporates the key components of a functioning green network. Proposals will be expected to reflect the guidance contained within Supplementary planning Guidance: Green Network & Environmental Management (Dec 2012).

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

James Sandeman (Ref 600/4)

Certain drainage solutions (e.g. swales & SUDS) can, if designed properly, be integrated to function as a drainage solution whilst providing a range of wildlife, recreational, landscape and access opportunities.

The Council will be guided by key stakeholders, including SEPA and Scottish Water, on water management within sites, however in general terms the Council is striving to achieve a green network which can provide multiple benefits including sustainable drainage.

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

(b) Policy D5: Protection of Urban Greenspace

Support

RSPB Scotland, South and West Region (Ref 280/7)

The Council acknowledges and welcomes the support for Policy D4.

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

Objections

Charles Murray (Ref 65/4)

Policy D5: Protection of Urban Greenspace which protects land in the vicinity of Capelrig Road is consistent with the existing designation Policy L1: Protection of Important Urban Greenspace which is contained within the Adopted East Renfrewshire Local Plan 2011 (CD/01).

The boundaries of the 2 adjacent Housing sites (SG1.34 and SG1.33) have not changed. Site SG1.34 is a well established housing site. Site SG1.33 is contained within the adopted Local Plan as a direct result of a recommendation emerging from the Local Plan Examination into the Adopted East Renfrewshire Local Plan (CD/01).

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

Sport Scotland (Ref 702/2)

The Council acknowledges and welcomes the support for Policy D5.

Playing fields are included within the range of typologies encompassed by the protection of Policy D5: Protection of Urban Greenspace. This is implicit within the policy, however to make this clearer the Council is supportive of the suggested amendments set out in the representation to include reference to the protection of playing fields in accordance with SPP.

If the Reporter is minded to accept these amendments the Supplementary Planning Guidance on Green Network and Environmental Management will be revised in due course to correspond to the changes within Policy D5.

The Council considers that there is sufficient reference to temporary greening within the Supplementary Planning Guidance on Green Network and Environmental Management and does not propose to add a further Policy reference to it.

If the Reporter is so minded to recommend that the Representation from Sport Scotland is accepted and the Plan modified, as set out below, the Council would be supportive of this modification because it would strengthen the policy and would not have any implications for the LDP Strategy or other policies within the LDP.

First sentence of the Policy should be amended to read (additional text in italics):

Urban greenspace, *including Playing fields*, identified on the Proposals Map, will be safeguarded. Proposals which would result in the loss of urban greenspace will be resisted unless it can be demonstrated that:

Insert 3 new criteria after bullet point 4 as follows:

- *The proposal is ancillary to the main use and would not have a detrimental effect on that use.*
- *The Playing field lost would be replaced by a comparable or improved one providing greater benefit within convenient location for users.*
- *There is an excess of sporting provision through Playing Field Strategy prepared in conjunction with Sport Scotland.*

(c) Policy D6: Protection of Local Urban Greenspace

Support

Nazir Ahmed (Ref 755/15)

The Council acknowledges and welcomes the support for Policy D6.

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

(d) Policy D7: Green Infrastructure and Open Space Provision within New Development**Support****Scottish Natural Heritage (Ref 88/10), Nazir Ahmed (Ref 755/16)**

The Council acknowledges and welcomes the support for Policy D7.

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

Objections**RSPB Scotland, South and West Region (Ref 280/8)**

The Council acknowledges that bio-diversity is a key element to the provision of successful green infrastructure and in particular the 'wildlife habitat'.

Therefore as suggested the Council agrees with the suggested text set out in the representation to insert the phrase 'wildlife habitat' into the first sentence of Policy D7: Green Infrastructure and Open Space Provision within New Development, paragraph 5.11.1

If the Reporter is so minded to recommend that the Representation from RSPB is accepted and the Plan modified, as set out below, the Council would be supportive of this modification because it would strengthen the policy and would not have any implications for the LDP Strategy or other policies within the LDP.

First sentence of the Policy should be amended to read (additional text in italics):

New development proposals should incorporate a range of green infrastructure including open space provision, multi use access, sustainable urban drainage, wildlife habitat and landscaping.

Persimmon Homes Ltd (Ref 743/10), Homes for Scotland (Ref 758/5)

This policy is designed to help provide certainty to the development industry and is enhanced by further guidance contained within the Supplementary Planning Guidance Green Network & Environmental Management.

Open space standards are only one element of the wider green infrastructure and there is now emphasis on the multiple benefits which greening can provide including placemaking, outdoor access, water management and biodiversity. A range of information has helped to inform the Supplementary Planning Guidance including the Core Paths Plan (CD/65), Green Network opportunities Mapping, Green Space Strategy (CD/51), Local Biodiversity Sites Survey (CD/63) and Scottish Government policies.

To revert back to a standard policy, principally focused on isolated open space provision is considered a retrograde step and would run contrary to the main thrust of Scottish Government policy .

The Policy aims to provide policy guidance which emphasises design based solutions which can provide multiple green infrastructure benefits. This is a move away from a standard policy approach. The Council maintains Policy D7 and associated Supplementary Planning Guidance is the most appropriate policy framework within which

to assist the development industry.

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

(e) Policy D8: Natural Features

Support

Scottish Natural Heritage (Ref 88/11), Roger Spooner (Ref 387/1)

The Council acknowledges and welcomes the support for Policy D8.

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

Objection

RSPB Scotland, South and West Region (Ref 280/9)

The Council welcomes and acknowledges the general support for this policy. In addition the Council also acknowledges and accepts the particular comments on the specific protection given to Sites of Special Scientific Interest (SSSI's).

If the Reporter is so minded to recommend that the Representation from RSPB is accepted and the Plan modified, as set out below, the Council would be supportive of this modification because it would strengthen the policy and would not have any implications for the LDP Strategy or other policies within the LDP.

First sentence of the Policy should be amended to read (additional text in italics):

There will be a strong presumption against development where it would compromise the overall integrity of ~~Sites of Special Scientific Interest~~, Local Biodiversity Sites, Tree Preservation Orders and ancient and long established woodland sites.

Development that affects a Sites of Special Scientific Interest will only be permitted where:

- *It will not adversely affect the integrity of the area or the qualities for which it has been designated.*
- *Any such adverse effects are clearly outweighed by social, environmental or economic benefits of national importance.*

The location of Sites of Special Scientific Interest, Local Biodiversity Sites.....

Lynch Homes (Ref 965/3)

The Council has identified a range of Local Biodiversity Sites as a result of a survey undertaken in 2012. Environmental designations are one of a number of considerations in relation to site selection and consequently have informed the preparation of the Proposed Plan.

There is a strong presumption against development where it would compromise the overall integrity of key natural features, including Sites of Special Scientific Interest and Local Biodiversity Sites and consequently the Council does not consider it appropriate to remove the Local Biodiversity Site designation from this site (LDP 66).

In addition, it should be noted that a previous application for residential development (2011/0824/TP) (CD/86) on this site was refused by the Council and subsequently dismissed at Appeal by the Scottish Government Reporter (PPA/220/2022) (CD/87).

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

Reporter's conclusions:

Policy D4: Green network

1. Policy D4 in the proposed plan states:

“5.8. Policy D4: Green network

5.8.1. The council will protect, promote and enhance the wildlife, recreational, landscape and access value of the green networks shown on the proposals map and within the green network and environmental management supplementary planning guidance.

5.8.2. Proposals for development that are likely to destroy or impact adversely on the character or function of the green network will be discouraged.

5.8.3. Where proposals are likely to adversely impact upon the green network, appropriate mitigation will be required.

5.8.4. All proposals will require to reflect the guidance within green network and environmental management supplementary planning guidance.

5.8.5. The provision of the green network will be a core component of any master plan.”

2. Adjustments are sought to the proposed plan which would: confirm that Policy D4 is not a policy in its own right, but a sub-category of a group of policies that include, the green belt (Policy D3), protection of urban greenspace (Policy D5), and natural features (Policy D8); ensure that the green network is not used for urban drainage; and confirm that enhancement of other parts of the green network should only be necessary where a development does not enhance the green network itself. The planning authority proposes no change to the plan.

3. The 2010 Scottish Planning Policy supported green networks linking greenspaces in and around settlements, and indicated that development plans should identify and promote them where this would add value to the provision, protection, enhancement and connectivity of open space and habitats. Scottish Planning Policy (2014) continues to support green networks as an integral component of successful placemaking. Scotland's Third National Planning Framework (2014) indicates that development plans are expected to identify green networks in all city regions, and it prioritises environmental improvements in the Central Belt and keeps the Central Scotland Green Network as a national development. Planning Advice Note 65, Planning and Open Space, explains that some of the best open spaces are parts of green networks, and that these can help to define landscape or townscape structure, provide links with the countryside, promote walking and cycling, and enhance connectivity for species and habitats. It also advises that planning authorities should try to extend and enhance green networks.

4. The Glasgow and Clyde Valley Strategic Development Plan states that the Glasgow and Clyde Valley Green Network is a fundamental key component of the spatial development strategy. It also states that in order to provide critical focus for delivery over such a large part of the city region and to provide momentum to the planned transformational change, prioritisation of action is key. Policy D4 reflects the provisions of Scottish Planning Policy (2014), Scotland's Third National Planning Framework (2014), Planning Advice Note 65, and the strategic development plan by seeking to protect, promote and enhance the wildlife, recreational, landscape and access value of the green networks shown on the proposals map.

5. Policies D3, D4, D5 and D8 are linked, but each serves a different purpose. While it may be possible to combine some of these policies (for example green network and greenspace), I consider that it would be inappropriate to treat the green network as a sub-category of other designations. The green network is an important concept in itself, which is recognised in national and strategic guidance and advice, and it is identified as a national development in this area. It focuses on connections between green spaces, includes links to the countryside, and it contributes, amongst other things, to the setting of built up areas. It is acceptable for sites to be covered by more than one green policy designation, and I consider it reasonable for the planning authority to have made the green network the subject of a freestanding policy.

6. Paragraph 3.7.1 of the proposed plan refers to one of the benefits of the green network being urban drainage. Scottish Planning Policy (2014) promotes avoidance of increased surface water flooding through requirements for sustainable drainage systems, and the Glasgow and Clyde Valley Strategic Development Plan indicates that sustainable urban drainage systems can contribute to the delivery of the Glasgow and Clyde Valley Green Network. It is widely recognised that sustainable drainage systems can contribute to green networks and greenspace, that they can be designed as attractive, integral amenity features within development, and that they can achieve significant ecological and water management enhancements. Policy E5 of the proposed plan requires such systems to be incorporated into all new development. Taking these factors into account, I consider that it is reasonable for paragraph 3.7.1 to refer to urban drainage, but that the paragraph would better reflect national and strategic guidance and other parts of the proposed plan if the words sustainable and systems were added so that it read sustainable urban drainage systems. For reasons of consistency, the same change should be made at paragraph 5.7.1.

7. Policy D4 requires appropriate mitigation where proposals are likely to adversely impact upon the green network. The proposed supplementary guidance explains that the mitigation sought will include the enhancement of other parts of the green network. I consider that it is reasonable for the planning authority to seek such enhancements where there are adverse impacts. Neither the policy nor the proposed guidance appears to be seeking mitigation where a proposal enhances the green network. Given this, I do not consider that any further clarification is required in the proposed plan to qualify the supplementary guidance by explaining that enhancement of other parts of the green network should only be necessary where a development does not enhance the green network itself. However, I believe that it would be helpful if the policy provided a better "hook" for the proposed guidance. This could be achieved by deleting the references in Policy D4 to the supplementary guidance, and inserting a new paragraph indicating that such guidance will provide further information and guidance, which all proposals require to reflect. It is unnecessary to refer in the policy to protecting the green network shown in the supplementary guidance because it already contains a more appropriate reference to

protecting the network shown on the proposals map.

8. Adjustments are required to the proposed plan as set out below.

Policy D5: Protection of urban greenspace

9. Policy D5 in the proposed plan states:

“5.9 Policy D5: Protection of urban greenspace

5.9.1 Urban greenspace, identified on the proposals map, will be safeguarded.

Proposals which would result in the loss of urban greenspace will be resisted unless it can be demonstrated that:

- There is no significant adverse impact on the landscape character and amenity of the site and surrounding area;
- There will be no loss of public access;
- There will be no or limited impact on nature conservation and any loss would be mitigated through enhanced provision elsewhere in the vicinity;
- The proposed loss would result in a community use, the benefit of which would outweigh the loss of urban greenspace...”

10. Adjustments are sought to the proposed plan which would provide appropriate policy protection for formal playing fields, in line with national guidance, and support the continued use for sport and recreation of stalled development sites which have been temporarily greened. Concern is also expressed about the potential effectiveness of the policy, given the planning authority’s approach to sites on Capelrig Road and a recent proposal on Fruin Avenue.

11. The 2010 Scottish Planning Policy highlighted the importance of good quality open spaces. Scottish Planning Policy (2014) continues to support open space and green infrastructure as an integral component of successful placemaking. It also supports valued and functional open space, or open space that is capable of being brought into use to meet local needs. Planning Advice Note 65, Planning and Open Space, explains that development plans have a key role in protecting and promoting high quality open space, that they safeguard important open spaces from development in the long term, and that they should indicate the circumstances in which new green spaces will be required as part of new developments. Policy D5 seeks to safeguard areas of urban greenspace, as shown on the proposals map, and it sets out the circumstances in which such open space can be used for other purposes.

12. The planning authority proposes to make the support implied in Policy D5 for playing fields explicit by mentioning playing fields and including 3 additional criteria for assessing proposals. These suggested changes partly meet the terms of the representation, which requests that proposals for playing fields be assessed against the 4 criteria contained in the 2010 Scottish Planning Policy. Scottish Planning Policy (2014) refers to outdoor sports facilities rather than playing fields, and I consider that it is reasonable to highlight the need to safeguard such facilities in the policy. Regarding its proposed additional criteria, the planning authority omits one criterion from those listed in national guidance, and has adjusted the terms of others. In a policy dealing solely with urban greenspace, and because national guidance contains criteria specifically for dealing with proposals affecting outdoor sport facilities, I consider that it is reasonable to change the policy to

include the criteria. This remains the case even though it is adding more detail to the proposed plan. However, the terms of Scottish Planning Policy (2014) should be more accurately reflected in order to avoid confusion.

13. I consider it unnecessary to refer in the proposed plan to such detailed matters as the continued use for sport and recreation of stalled development sites which have been temporarily greened. Scottish Planning Policy (2014) encourages, in general terms, temporary greening, and the planning authority has reasonably dealt with this issue in the proposed supplementary guidance. While the continued use for sport and recreation of stalled development sites is not referred to in the supplementary guidance, the matter cannot be considered further at this examination because the content of such guidance is not being scrutinised.

14. I consider that Policy D5, together with Policies D1 (detailed guidance for all development), D4 (green network) and D6 (protection of local urban greenspace), provide a reasonable framework for protecting open spaces, and that their terms (as adjusted below) broadly reflect the thrust of national guidance and advice. Reference is made to 2 sites on Capelrig Road, which it appears are continuations of housing allocations from the 2011 adopted East Renfrewshire Local Plan. One of these sites has now been granted planning permission for development and, at Issue 9.1.4, it is recommended that both sites be retained as housing allocations. Reference is also made to Fruin Avenue but the proposed plan does not include any allocations for development in that location. There is therefore nothing to scrutinise, and it would be for the planning authority to consider proposals that come forward for this site, or any other site used as open space, against the policy framework in the proposed plan and any other material considerations.

15. Adjustments are required to the proposed plan as set out below.

Policy D7: Green infrastructure and open space provision within new development

16. Policy D7 in the proposed plan states:

“5.11 Policy D7: Green infrastructure and open space provision within new development

5.11.1 New development proposals should incorporate a range of green infrastructure including open space provision, multi use access, sustainable urban drainage and landscaping. This infrastructure should not only form an integral part of the proposed scheme but should complement its surrounding environment...”

17. Adjustments are sought to the proposed plan which would: include biodiversity in Policy D7 by inserting a reference to wildlife habitat; require open space provision to be justified by a clear strategy and local standards; and ensure that the wording of the policy is in accord with the 2010 Scottish Planning Policy, only require new provision in a development, or contributions to upgrading existing provision, where there is a deficiency in the area, and confirm that contributions will be sought on the terms set out in Circular 3/2012, Planning Obligations and Good Neighbour Agreements (an alternative wording for the policy is suggested)

18. The 2010 Scottish Planning Policy indicates that local development plans or supplementary guidance should set out specific requirements for the provision of open space as part of new development and make clear how much, of what type and quality and what the accessibility requirements are. It explains that planning authorities and

developers should aim to create new open spaces which are fit for purpose, maintained and sustainable over the long term.

19. Scottish Planning Policy (2014) indicates that the planning system should, amongst other things, consider green infrastructure as an integral element of places from the outset of the planning process. It sets out that development plans should be based on a holistic, integrated and cross-sectoral approach to green infrastructure, that they should be informed by relevant up to date audits, strategies and action plans covering green infrastructure's multiple functions, and that they should promote consistency with these and reflect their priorities and spatial implications. It also explains that local development plans should seek to enhance existing, and promote the creation of new, green infrastructure through a design led approach, applying standards which facilitate appropriate provision, and result in a proposal that is appropriate to place, including connections to other green infrastructure. It points out that supplementary guidance or master plans may be used to achieve this.

20. The planning authority proposes to change the policy by referring to wildlife habitats. This change satisfactorily and appropriately addresses the matter raised in one of the representations.

21. The policy sets an appropriate principle for the provision of green infrastructure in new developments by referring to the range of functions (including green and blue features) that it should incorporate, and by requiring it to both form an integral part of proposals and to complement the surrounding environment. It broadly reflects the holistic, integrated, cross-sectoral, and design-led approach sought in Scottish Planning Policy (2014). I consider that the detail set out in the proposed supplementary guidance on the green network and environmental management reasonably builds on the principle set out. It explains that a range of documents are relevant in considering green infrastructure in new developments, including the Core Paths Plans (2012), the Greenspace Strategy (2008-12), and the Local Biodiversity Action Plan. It also sets out in detail how proposals should approach green infrastructure provision, lists 6 qualities for successful greenspace, and sets out guidelines for open space in new development.

22. I am not persuaded that it is helpful to make reference in the policy to providing green infrastructure in accordance with local standards, and to requiring provision in developments or developer contributions only where the required local standards are not met and there is a deficiency in the area. Such changes would make the policy overly restrictive, would place undue emphasis on a quantitative based approach over a qualitative one, and could have an undermining effect on attempts at successful placemaking, a key concept in Scottish Planning Policy (2014). I note that the planning authority's approach already embraces standards of green infrastructure provision for new housing developments, which are set out in appendix I of the proposed supplementary guidance. The approach to all contributions for developments are also dealt with in the proposed plan at Strategic Policy 3, and in the associated supplementary guidance. These are covered at Issue 2.3 of this report, where it is recommended that the supporting text be updated to refer to Circular 3/2012 and its 5 tests for developer contributions. No changes are required in relation to these particular matters.

23. Overall, an adjustment is required to Policy D7, as set out below.

Policy D8: Natural features

24. Policy D8 in the proposed plan states:

“5.12 Policy D8: Natural features

5.12.1 There will be a strong presumption against development where it would compromise the overall integrity of sites of special scientific interest, local biodiversity sites, tree preservation orders and ancient and long established woodland sites. The location of sites of special scientific interest, local biodiversity sites and tree preservation orders are identified on the proposals map and referred to under schedule 1.

5.12.2 Planning permission will not be granted for development that is likely to have an adverse effect on protected species unless it can be justified in accordance with the relevant protected species legislation.

5.12.3 Development within or in close proximity to the natural features outlined above shall be assessed against the criteria set out in the green network and environmental management supplementary planning guidance...”

25. Adjustments are sought to the proposed plan which would: provide specific protection in Policy D8 for sites of special scientific interest in line with the wording in the 2010 Scottish Planning Policy; and delete the local biodiversity designation from a site at the western edge of Neilston, adjacent to, and to the north of, Uplawmoor Road.

26. The 2010 Scottish Planning Policy and Scottish Planning Policy (2014) set out a number of the protection regimes applying to the natural environment, including sites of special scientific interest. The 2010 SPP indicated that a strategic approach should be taken to natural heritage. Scottish Planning Policy (2014) indicates that development plans should address the potential effects of development on the natural environment. They should also set out the factors which will be taken into account in development management. Policy D8 sets out the broad principles to be applied when assessing the impact of proposals on the natural environment.

27. The planning authority proposes to change Policy D8 by inserting the 2 criteria given in the 2010 Scottish Planning Policy for assessing proposals which affect sites of special scientific interest. In a policy focussed on natural features, and because national guidance contains criteria specifically for protecting sites covered by national designations, I consider that it is reasonable to include the criteria in the policy. This remains the case even though it is adding more detail to the proposed plan. However, the terms of Scottish Planning Policy (2014) should be more accurately reflected in order to avoid confusion. In considering the representation related to this change, I have also concluded that it would be helpful if the policy provided a better link to, and “hook” for, the proposed supplementary guidance. This could be achieved by deleting the references in Policy D8 to the supplementary guidance, and inserting a new paragraph indicating that such guidance will provide further information and guidance, including criteria, against which all proposals within or in close proximity to the natural features mentioned require to be assessed.

28. The request to delete the local biodiversity designation from a site at Neilston is linked to a representation promoting the site for housing (LDP66). That representation is dealt with at Issue 3.10, and it is recommended that the site be retained in the green belt.

It appears that the local biodiversity designation covers a larger area than the site referred to in the representation. There is little evidence before the examination about the designation. However, it is referred to in the planning authority's review of sites of nature conservation importance (SINCs) in East Renfrewshire (May 2013). The review indicates that the designated area was surveyed quite recently in 2012, and points towards it having some biodiversity value. The decisions on the planning application for housing on part of the designated site (2011), and the subsequent appeal (April 2013) pre-date the publication of the review. I also note that the planning appeal decision does not turn on, or fully deal with, local biodiversity issues. In the circumstances, and bearing in mind the recommendation to retain the site in the green belt, I am not persuaded that the designation as shown on the proposals map should be deleted, or that any part should be adjusted. If a future planning application for housing or other development comes forward at this location, it can address the extent to which the designated site, in whole or part, has or lacks biodiversity value. No change requires to be made in relation to this particular matter.

29. Overall, an adjustment is required to Policy D8, as set out below.

Reporter's recommendations:

I recommend that the following modifications be made:

Policy D4: Green Network

1. Adjust Policy D4 (to include the deletion of paragraph 5.8.4 and text from paragraph 5.8.1) to read (*changes in italics*):

"5.8. Policy D4: Green Network

5.8.1. The council will protect, promote and enhance the wildlife, recreational, landscape and access value of the green networks shown on the proposals map.

5.8.2. Proposals for development that are likely to destroy or impact adversely on the character or function of the green network will be discouraged.

5.8.3. Where proposals are likely to adversely impact upon the green network, appropriate mitigation will be required.

5.8.4. The provision of the green network will be a core component of any master plan

5.8.5. *Further detailed information and guidance, which all proposals require to reflect, is set out in the Green Network and Environmental Management Supplementary Guidance*";

2. Adjust the penultimate sentence of paragraphs 3.7.1 and 5.7.1 to read (*changes in italics*):

"...They can provide a wide range of benefits to the urban environment including opportunities for physical activity, biodiversity, walking, cycling, *sustainable urban drainage systems* and carbon storage..."

Policy D5: Protection of urban greenspace

3. Adjust Policy D5 to read (*changes in italics*):

“5.9. Policy D5: Protection of urban greenspace

5.9.1. Urban greenspace, *including outdoor sports facilities*, identified on the proposals map, will be safeguarded. Proposals which would result in the loss of urban greenspace will be resisted unless it can be demonstrated that:

- There is no significant adverse impact on the landscape character and amenity of the site and surrounding area;
- There will be no loss of public access;
- There will be no or limited impact on nature conservation and any loss would be mitigated through enhanced provision elsewhere in the vicinity;
- The proposed loss would result in a community use, the benefit of which would outweigh the loss of urban greenspace.

Additionally, for outdoor sports facilities, the following will have to be demonstrated:

- *The proposal is ancillary to the principal use of the site as an outdoor sports facility;*
- *The proposal involves only a minor part of the outdoor sports facility and would not affect its use and potential for sport and training;*
- *The outdoor sports facility would be replaced either by a new facility of comparable or greater benefit for sport in a location that is convenient for users, or by the upgrading of an existing outdoor sports facility to provide a facility of better quality on the same site or at another location that is convenient for users and maintains or improves the overall playing capacity in the area; or*
- *The relevant strategy, prepared in consultation with Sportscotland, shows that there is a clear excess of provision to meet current and anticipated demand in the area, and that the site would be developed without detriment to the overall quality of provision.*

5.9.2 Further...”

Policy D7: Green infrastructure and open space provision within new development

4. Adjust Policy D7 to read (*changes in italics*):

“5.11.1. New development proposals should incorporate a range of green infrastructure including open space provision, multi use access, sustainable urban drainage, *wildlife habitat* and landscaping. This infrastructure should not only form an integral part of the proposed scheme but should complement its surrounding environment.

5.11.2 Further ...”

Policy D8: Natural Features

5. Adjust Policy D8 (to include the deletion of the reference to sites of special scientific interest from paragraph 5.12.1) to read (*changes in italics*):

“5.12. Policy D8: Natural features

5.12.1. There will be a strong presumption against development where it would compromise the overall integrity of local biodiversity sites, tree preservation orders and ancient and long established woodland sites.

Development that affects a site of special scientific interest will only be permitted where:

- *The objectives of designation and the overall integrity of the area will not be compromised; or*
- *Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.*

The location of sites of special scientific interest, local biodiversity sites and tree preservation orders are identified on the proposals map and referred to under schedule 1.

5.12.2. Planning permission will not be granted for development that is likely to have an adverse effect on protected species unless it can be justified in accordance with the relevant protected species legislation.

5.12.3. Further detailed information and guidance is set out in the Green Network and Environmental Management Supplementary Guidance, including criteria against which development proposals within or in close proximity to the natural features outlined above will be assessed.

5.12.4. Through ...”

Issue 4.2	OUTDOOR ACCESS	
Development plan reference:	Policy D9: Protection of Outdoor Access Policy D10: Environmental Projects Schedule 1: Natural Environment and Projects	Reporter: Dilwyn Thomas
Body or person(s) submitting a representation raising the issue (including reference number):		
SEPA (Ref 70/8) Scottish Natural Heritage (Ref 88/12) Ian Gladstone (Ref 380/5) Roger Spooner (Ref 387/2) Nazir Ahmed (Ref 755/17) (Ref 755/18)		
Provision of the development plan to which the issue relates:	Chapter 5: Placemaking and Design Para. 5.13-5.15.3 Policy D10.1 Dams to Darnley Country Park Policy D10.3 Rouken Glen, Giffnock	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy D9: Protection of Outdoor Access</u></p> <p><u>Support</u></p> <p><u>Scottish Natural Heritage (Ref 88/12)</u> - We welcome the inclusion of Policy D9: Protection of Outdoor Access and the protection given to core paths and rights of way.</p> <p><u>Roger Spooner (Ref 387/2), Nazir Ahmed (Ref 755/17)</u> - Support policy</p> <p><u>(b) Policy D10: Environmental Projects</u></p> <p><u>Support</u></p> <p><u>Nazir Ahmed (Ref 755/18)</u> - Support policy</p> <p><u>(c) Policy D10.1 Dams to Darnley Country Park</u></p> <p><u>Objection</u></p> <p><u>Ian Gladstone (Ref 380/5)</u> Park is not well used and investment will not have a significant impact on this. Proposed spend better directed elsewhere.</p> <p><u>(d) Policy D10.3 Rouken Glen, Giffnock</u></p> <p><u>Objection</u></p> <p><u>SEPA (Ref 70/8)</u> - Assessment of flood risk required.</p>		

Modifications sought by those submitting representations:**(c) Policy D10.1 Dams to Darnley Country Park**

Ian Gladstone (Ref 380/5) - Delete proposals in relation to Country Park.

(d) Policy D10.3 Rouken Glen, Giffnock

SEPA (Ref 70/8) - Flood Risk Assessment required.

Summary of responses (including reasons) by planning authority:**(a) Policy D9: Protection of Outdoor Access****Support**

Scottish Natural Heritage (Ref 88/12), Roger Spooner (Ref 387/2), Nazir Ahmed (Ref 755/17)

The Council acknowledges and welcomes the support for Policy D9.

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

(b) Policy D10: Environmental Projects**Support**

Nazir Ahmed (Ref 755/18)

The Council acknowledges and welcomes the support for Policy D10.

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

(c) Policy D10.1 Dams to Darnley Country Park**Objection**

Ian Gladstone (Ref 380/5)

The Council recognises Dams to Darnley Country Park, which is managed in partnership with Glasgow City Council, as a key asset and major recreational and environmental resource.

A Masterplan (CD/50) and Development and Management Plan (CD/49) have paved the way for a range of works which have ensured a steady increase in visitor numbers and events since the Parks inception in 2006.

The partner Authorities have long recognised the need for visitor facilities within the Park and proposals being taken forward through this Proposed Plan will provide a basis for this and the future development of the Park. They will seek to provide a resource for both local users and those residing further afield.

It is anticipated that funding for this work will be through a variety of sources including Council resources, government grants, development contributions and commercial venture.

The Council is satisfied that the aspiration of the Proposed Plan in relation to the Country Park are both desirable and justified and for this reason no modification is proposed.

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

(d) Policy D10.3 Rouken Glen, Giffnock

Objection

SEPA (Ref 70/8)

The £2.15m grant from Heritage lottery Fund and the £1m from East Renfrewshire Council is funding physical improvements to the park and a wide range of events and activities. The works will be carried out over the next three years to make the park more sustainable, interesting and fit for purpose.

A range of projects, many which will not have physical implications, are part of the Park Improvement project. In the event certain proposals are of a type that would require a full flood Risk Assessment, this will be undertaken.

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

Reporter's conclusions:

1. Policy D10 in the proposed plan states:

“5.15 Policy D10: Environmental projects

5.15.1 The council will continue to support Dams to Darnley Country Park (D10.1) and Whitelee Access Project (D10.2), as shown on the proposals map and schedule 1, and the implementation of agreed priorities set out in the relevant management/access plans for each project.

5.15.2 The council will also support and promote plans and projects at Rouken Glen Park (D10.3) as shown on the proposals map and schedule 1, as part of the Heritage Lottery Fund.

5.15.3 The council will seek improvements to Dams to Darnley Country Park through Policies M2 and policy M2.1 and M2.2. Future supplementary planning guidance will be prepared for the country park to reflect the aspirations of Policies M2 and M2.1 and M2.2.”

2. Adjustments are sought to the proposed plan which would: remove the commitment to investing in improvements to the Dams to Darnley Country Park; and require a flood risk assessment for development proposed in Rouken Glen Park and a commitment to no development taking place in the functional flood plain or being within an area of any known flood risk.

3. The 2010 Scottish Planning Policy indicates that the planning system has a role in helping to create an environment where physical wellbeing is improved and activity made easier. Scottish Planning Policy (2014) sets out 13 principles to guide policies and decisions, and 2 of the principles are: improving health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation;

and protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment. The country park is supported, in general terms, in the 2012 Glasgow and Clyde Valley Strategic Development Plan through its inclusion in the green network.

4. There is little evidence to support the contention that no investment should be made in the country park. The proposed plan explains that the reasons for selecting the M77 area for growth have been informed by 4 factors, and one of these is the potential to enhance Dams to Darnley Country Park, which is highlighted as one of the area's most important leisure facilities. Both Policies M2.1 and M2.2 indicate that the master plans for the strategic development opportunities at Malletsheugh/Maidenhill, Newton Mearns and Barrhead South (Springhill, Springfield, LyonCross) should address, amongst other things, a requirement for the enhancement of the country park by improving access, tourism activity and by encouraging appropriate commercial and leisure activity on key sites.

5. The country park is being developed jointly with Glasgow City Council, and there is a development and management plan in place covering the period 2011-16, which seeks £583000 of further investment. There is also a park master plan. The park covers 550 hectares, is close to the built-up areas of Newton Mearns, Barrhead and Darnley, and is accessible by a large population. The management plan indicates that annual visitor numbers are estimated to be around 90000. I am satisfied that further development of the park and its facilities would encourage more visitors, would serve the strategic development opportunities proposed, would be likely to help strengthen the role of the green belt at a vulnerable location, and would be consistent with the principles in national guidance of improving health and well-being, and enhancing and promoting access to natural heritage. It would also be consistent with strategic guidance. In the circumstances, I consider that the references in Policy D10 to the country park (paragraphs 5.15.1 and 5.15.2) should be retained.

6. In relation to Rouken Glen Park, the planning authority explains that a flood risk assessment will be carried out if necessary, but do not propose to refer to such an assessment in the plan. The risk of flooding is an important issue, and I consider that the plan should refer to a flood risk assessment. I note that the plans and projects referred to in Policy D10 and schedule 1 involve not just physical improvements to the park but also a wide range of events and activities, and that many of these do not seem to have physical implications. It also appears that only limited areas of the park are at risk of flooding. In the circumstances, I am satisfied that it would be sufficient to indicate in the supporting text of Policy D10 (paragraph 5.13.3) that a flood risk assessment may be required, depending on the nature of the plan or project and its location in the park.

7. An adjustment is required to the proposed plan as set out below.

Reporter's recommendations:

I recommend that the following modification be made:

1. Add the following sentence at the end of paragraph 5.13.3, so that the paragraph reads (*changes in italics*):

"5.13.3. In addition Dams to Darnley Country Park and the Whitelee Access Project provide a range of walking, cycling and orienteering routes together with a well

established events programme run by the Countryside Ranger Service, which aim to increase activity levels and environmental knowledge and understanding amongst the public and school children. *At Rouken Glen Park, the plans and projects coming forward may require the submission of a flood risk assessment, depending on their nature and location.*"

Issue 5	DETAILED GUIDANCE FOR ALL DEVELOPMENT	
Development plan reference:	Policy D1: Detailed Guidance for all Development	Reporter: Dilwyn Thomas
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>The Coal Authority (Ref 59/2) (Ref 59/3) Scottish Natural Heritage (Ref 88/8) RSPB Scotland, South and West Region (Ref 280/5) Roger Spooner (Ref 387/7) Keith A Vallance (Ref 536/5) D Jesner (Ref 783/9) Nazir Ahmed (Ref 755/11) Carol A Gilbert, SPT (Ref 969/4)</p> <p><u>Appendix 1 - Standard Letter</u> Standard Letter Comment D1A (5 reps) (Ref 987/1) Standard Letter Comment D1B (7 reps) (Ref 988/1)</p>		
Provision of the development plan to which the issue relates:	Chapter 5: Placemaking and Design Para. 5.1-5.2.1	
Planning authority's summary of the representation(s):		
<p><u>Support</u></p> <p><u>The Coal Authority (Ref 59/2)</u> Supports policy recognition that land instability arising from mining legacy needs to be considered. Consider that the issue of ground conditions is properly highlighted in the LDP.</p> <p><u>Scottish Natural Heritage (Ref 88/8)</u> We welcome the criteria which have to be met for development proposals. We particularly support the inclusion of the following criteria 4. The development should not impact adversely on landscape character or the green network, involve a significant loss of trees or other important landscape, greenspace or biodiversity features; 5. Developments should incorporate green infrastructure including access, landscaping, greenspace, water management and Sustainable Urban Drainage Systems at the outset of the design process. Where appropriate, new tree or shrub planting should be incorporated using native species. The physical area of any development covered by impermeable surfaces should be kept to a minimum to assist with flood risk management. 14. Development should enhance the opportunity for and access to sustainable transportation, particularly walking and cycle opportunities including cycle parking and provision of facilities such as showers/lockers, where appropriate. The Council will not support development on railways solums or other development that would remove opportunities to enhance pedestrian and cycle access unless mitigation measures have</p>		

been demonstrated;

Reason - This should help ensure the green network natural heritage active travel is integral to proposed

RSPB Scotland, South and West Region (Ref 280/5) - Support policy

Nazir Ahmed (Ref 755/11) - Support policy

Objections

The Coal Authority (Ref 59/3) - Council should use GIS data submitted by the Coal Authority in October 2011.

Roger Spooner (Ref 387/7)

Public space where people can mingle is an under recognised need

Increased private malls and sports facilities risk segregating people

Keith A Vallance (Ref 536/5)

Does not adequately prioritise impact on new development on existing local infrastructure
Development should only be considered if the necessary infrastructure is in place

D Jesner (Ref 783/9), Standard Letter Comment D1B (7 reps) (Ref 988/1)

House designs should be of interesting design and mix with hip, cross-hip or cross-gable roofs. Single or two-way pitched roofs should not be encouraged.

New homes should have one off road parking space per bedroom plus one additional space

Off road parking should be tandem driveways with room to open doors and of permeable material

New homes on sites of more than one house should have latest recommended design of both fibre network on site, data cabinets and all connections external to the site; for high speed internet access and telephony

SPT (Ref 969/4) - There is a particular issue in new housing developments when bus infrastructure is not provided from the outset and funding is not available. While there is a reference in Policy SG10, there is no clear reference to the need for new infrastructure to be funded by the developer.

Standard Letter Comment D1A (5 reps) (Ref 987/1)

No provision under SPGs for developers of more than one house to included provision for connectivity to fibre optic network/high speed internet.

Modifications sought by those submitting representations:

Roger Spooner (Ref 387/7) - Policy should facilitate genuine public spaces and allow diverse use.

Keith A Vallance (Ref 536/5) - Policy should prioritise impact on new development on existing local infrastructure.

D Jesner (Ref 783/9), Standard Letter Comment D1B (7 reps) (Ref 988/1)

House designs should be of interesting design and mix with hip, cross-hip or cross-gable roofs. Single or two-way pitched roofs should not be encouraged.

New homes should have one off road parking space per bedroom plus one additional space
Off road parking should be tandem driveways with room to open doors and of permeable material

SPT (Ref 969/4)

In Policy SG10, there is no clear reference to the need for new infrastructure to be funded by the developer.

Section 14 reworded to include after sustainable transportation: "including provision for bus infrastructure, where appropriate".

D Jesner (Ref 783/9), Standard Letter Comment D1B (7 reps) (Ref 988/1), Standard Letter Comment D1A (5 reps) (Ref 987/1) - Policy created to ensure developers in site plans and house design include the latest recommendations for connectivity to internet/telephony/fibre optic.

Summary of responses (including reasons) by planning authority:

Support

The Coal Authority (Ref 59/2), Scottish Natural Heritage (Ref 88/8), RSPB Scotland, South and West Region (Ref 280/5), Nazir Ahmed (Ref 755/11)

The Council acknowledges and welcomes the support for Policy D1.

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

Objections

The Coal Authority (Ref 59/3) - The legacy of the former mining activity within East Renfrewshire is addressed through criteria 13 within Policy D1- Detailed Guidance for All Development. This approach follows that recommended by the Reporter relating to the Local Plan, East Renfrewshire Local Plan: Report of Examination p18 (CD/02). The use of GIS data is noted.

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

Roger Spooner (Ref 387/7) - The Council believe that there is an emphasis throughout the Plan on protection of urban green space, including formal and informal recreational space, and in providing an appropriate level of open space provision in new developments. An SPG on the Green Network and Environmental Management further emphasises this need. Appropriate policies are D1, D4, D5, D6, D7, D8 and D9 and these together with the SPG provide clear guidance on this issue.

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

Keith A Vallance (Ref 536/6) - The Council, in Strategic Policy 2: Assessment of Development Proposals and Strategic Policy 3: Development Contributions, para 3.17.2 fully covers the point raised by the respondent. The Plan has a number of policies that contribute to achieving the overall vision and Strategic aim.

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

SPT (Ref 969/4)

The Council agrees with the representation.

If the Reporter is so minded to recommend that the Representation from SPT is accepted and the Plan modified, as set out below, the Council would be supportive of this modification because it would strengthen the policy and would not have any implications for the LDP Strategy or other policies within the LDP.

Criteria 14 of the Policy should be amended to read (additional text in italics):

Development should enhance the opportunity for and access to sustainable transportation, *including provision for bus infrastructure, particularly walking and cycling.... ..*

D Jesner (Ref 783/9), Standard Letter comment – D1B (7 reps) (Ref 988/1)

The Council has prepared a Householder Design Guide SPG and a Daylight and Sunlight Design Guide SPG. This, together with the policy D1 and reference to the Scottish Government's 'Designing Places' and 'Designing Street' provides adequate emphasis on the quality of design in new Development. As para 1.10.2 notes, the Council will also prepare other SPGs, master plans and development Briefs as required.

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

D Jesner (Ref 783/9), Standard Letter comment – D1B (7 reps) (Ref 988/1)

Representations commented on parking standards and off road parking. This level of detail is not appropriate to be included within the Plan but is properly managed through the development management process at planning application stage. The Council does have approved Council car parking standards and new development must be in accordance with these and agreed with the Council's Roads and Transportation Service. As part of sustainable economic growth, the Council is keen to reduce dependency upon private cars therefore would not consider it appropriate to increase the parking standards.

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

John Hall (Ref 486/18), D Jesner (Ref 783/9), Standard letter comment – D1A (5 reps) (Ref 987/1) Standard Letter comment – D1B (7 reps) (Ref 988/1)

The respondents refer to high speed internet and telephony being available to all new developments of more than one house. This issue is dealt with under separate legislation. Operators are licensed by the UK Government and the Scottish Government is actively promoting the installation of high speed broadband connections throughout the country. This issue is reflected in National Planning Framework 3 (CD/67). The Council will encourage the use of broadband in new developments although has no direct control over this process.

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

Reporter's conclusions:

1. Policy D1 in the proposed plan states:

“5.2 Policy D1: Detailed guidance for all development

5.2.1. Proposals for development should be well designed, sympathetic to the local area and demonstrate that the following criteria have been considered and, where appropriate, met. In some cases, where the written criteria have not been met, a written justification will be required to assist with assessment:

1. The development should not result in a significant loss of character or amenity to the surrounding area;
2. The proposal should be of a size, scale, massing and density that is in keeping with buildings in the locality and should respect local architecture, building form, design, and materials;
3. The amenity of neighbouring properties should not be adversely affected by unreasonably restricting their sunlight or privacy...;
4. The development should not impact adversely on landscape character or the green network, involve, a significant loss of trees or other important landscape, greenspace or biodiversity features;
5. Developments should incorporate green infrastructure including access, landscaping, greenspace, water management and sustainable urban drainage systems at the outset of the design process...;
6. Development should create safe and secure environments that reduce the scope for anti-social behaviour and fear of crime;...
- ...9. Parking and access requirements of the council should be met in all development and appropriate mitigation measures should be introduced to minimise the impact of new development...;
- ...13. Where applicable, new development should take into account the legacy of former mining activity;
14. Development should enhance the opportunity for and access to sustainable transportation, particularly walking and cycling opportunities...;
15. The council requires the submission of a design statement for national and major developments...”

2. Adjustments are sought to the proposed plan which would: facilitate the development of genuine public spaces where people can mingle; prioritise in the policy the impact of development on existing local infrastructure; provide for an interesting mix of house designs, adequate off street parking, and high speed internet access and telephony (to the latest recommended standards for fibre networks); and refer at criterion 14 to sustainable transportation including bus infrastructure. A representation also highlights that the GIS data provided to the planning authority on the coal mining legacy in East Renfrewshire could be of use in preparing the local development plan.

3. In essence, Policy D1 sets out criteria to be considered in assessing a planning application at the development management stage. Further criteria for assessing planning applications are contained in other policies in the proposed plan. In general terms, the 2010 Scottish Planning Policy and Scottish Planning Policy (2014) recognise that the development management process has an important part to play in a planning system that strives to: support the creation of high quality, well designed, sustainable places making efficient use of land, buildings and infrastructure; protect and enhance the

built and natural environment; and support sustainable economic growth and the change to a low carbon economy. To the extent that policy D1 is supporting high quality development in appropriate, sustainable locations, it is consistent with the strategic vision and spatial development strategy of the Glasgow and Clyde Valley Strategic Development Plan.

4. The planning authority proposes to change criterion 14 of Policy D1, which deals with sustainable transportation, by adding a reference to the provision of bus infrastructure. The change meets the terms of the representation, and would be appropriate.

5. Policy D1 has to be read alongside Strategic Policy 2 (assessment of development proposals) of the plan. Strategic Policy 2 indicates in its introduction that proposals for new development, other than smaller scale proposals, will be judged against its 15 criteria as well as the relevant criteria in Policy D1. Criteria 5 to 7 of Strategic Policy 2 deal with the impact of proposals on existing and planned infrastructure, the impact upon community, leisure and educational facilities, and the impact on the road and rail network. Additionally, Strategic Policy 3 sets out the proposed plan's approach to securing contributions towards infrastructure required to mitigate the impacts of new development. I consider that the proposed plan, when taken as a whole, adequately addresses the potential impact of development proposals on local infrastructure. In the circumstances, I am not persuaded that it is necessary to make further reference to this matter in Policy D1.

6. Additionally, the need for well designed development, sympathetic to the local area is highlighted in the introduction to Policy D1, and many of the criteria in the policy relate to design matters. A number of the criteria in Strategic Policy 2 cover design matters, and Policies D4 (green network), D5-D6 (greenspace), D7 (green infrastructure and open space provision), amongst other policies, are connected to design matters. Taking these policies together, I am satisfied that the proposed plan implicitly recognises the 6 qualities of a successful place, as referred to in Scottish Planning Policy (2014), and that it sets reasonable design principles. In the circumstances, I am not persuaded that specific, further reference has to be made to the development of genuine public spaces and the provision of an interesting mix of house designs. I also consider that it is unnecessary to set out in the proposed plan matters of detail, such as parking standards for housing. I note that criterion 9 of Policy D1 indicates that the parking and access requirements of the council should be met in all development along with appropriate mitigation measures, and this is sufficient. In any event, I am not satisfied that the high parking standard referred to in the representation is justified.

7. The planning authority indicates that it will encourage the use of broadband in new development, but does not propose to refer to this in the proposed plan. Scottish Planning Policy (2014) indicates that development plan policies should encourage developers to explore opportunities for the provision of digital infrastructure to new homes and business premises as an integral part of development. While I accept that that this guidance would not fully meet the terms of the representations lodged, it would in part, and I consider that it would be a justified and reasonable addition to the criteria in Policy D1.

8. Criterion 13 in Policy D1 deals with former mining activity and it is recommended under Issue 1, elsewhere in this report, that a new policy on minerals should be added to the plan. I believe that it would add further unnecessary detail to the proposed plan if reference was made to the usefulness of the GIS data provided to the planning authority

on this activity.

9. Overall, adjustments are required to the proposed plan as set out below.

Reporter's recommendations:

I recommend that the following modifications be made:

1. Adjust the first sentence of criterion 14 of Policy D1 to read (*changes in italics*):

"14. Development should enhance the opportunity for and access to sustainable transportation, *including provision for bus infrastructure, and* particularly walking and cycle opportunities, including cycle parking and provision of facilities such as showers/lockers, *all where appropriate...*"

2. Add an additional criterion to Policy D1 to read (*changes in italics*):

"16. *Where applicable, developers should explore opportunities for the provision of digital infrastructure to new homes and business premises as an integral part of development.*"

Issue 6	BUILT HERITAGE	
Development plan reference:	Policy D11: Management and Protection of the Built Heritage Policy D12: New Conservation Areas	Reporter: Dilwyn Thomas
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Alastair Graham and Monique Graham (Ref 13/1) Crookfur Residents Committee (Ref 54/1) Crookfur Residents Committee (Ref 55/1) Crookfur Residents Association (Ref 56/1) Retail Trust (Ref 89/1) Richard A Shaw (Ref 234/1) (Ref 234/2) Barbara Rourke (Ref 494/1) Nazir Ahmed (Ref 755/19) (Ref 755/20) Alistair Hendry (Ref 966/1) (Ref 966/2)</p>		
Provision of the development plan to which the issue relates:	Chapter 5: Placemaking and Design Policy D11.6 Netherlee Article 4 Direction Area Policy D11.21 Caldwell House, Uplawmoor Policy D12.1 Netherlee Policy D12.2 Crookfur Cottage Homes	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy D11: Management and Protection of the Built Heritage</u></p> <p><u>Support</u></p> <p><u>Nazir Ahmed (Ref 755/19)</u> - Support policy</p> <p><u>Objection</u></p> <p><u>Richard A Shaw (Ref 234/1)</u> There are a significant number of entries in the Royal Commission on the Ancient and Historic Monuments of Scotland (RCAHMS) database pertaining to Caldwell and its historic landscape this highlights the importance of the historic landscape in the immediate area of Caldwell House. This aspect of the site (and perhaps other sites) should be acknowledged as part of the plan or as appropriate elsewhere, including on associated maps. This would then help reflect a more accurate picture consistent with the claims of section 3.6.</p> <p><u>(b) Policy D11.6 Netherlee Article 4 Direction Area, Policy D12.1 Netherlee</u></p> <p><u>Support</u></p> <p><u>Alastair Graham and Monique Graham (Ref 13/1)</u> Strongly support designation of Netherlee Conservation Area (D12.1). Long term residents, support the stronger protection of character and architecture such as sandstone terraces through Conservation Area designation rather than article 4. Wish to see a commitment by the council to the ongoing preservation of the area in the</p>		

Conservation Area

Appraisal and associated consultation. Look forward to the Council moving it forward in the shortest term possible.

Alistair Hendry (Ref 966/1)(Ref 966/2) - Support and promote policy to protect character (D11.6 and D12.1)

Objection**Barbara Rourke (Ref 494/1)**

Object to change of status without direct consultation with residents

No benefits to residents from changes

Disadvantages in planning fees and applications

No assessment of necessity for area

Parking restrictions need revised in light of inability to convert front gardens to driveways

Support preservation of area but flexibility required

(c) Policy D11.21 Caldwell House, Uplawmoor**Objection****Richard A Shaw (Ref 234/2)**

What is meant by 'limited development to secure listed building restoration'. What constraints should be imposed to safeguard important features of the landscape.

Restoration of the house and preservation of an important historic landscape with high amenity value are likely to be in conflict.

(d) Policy D12: New Conservation Areas**Support**

Nazir Ahmed (Ref 755/20) - Support policy

Objection**Retail Trust (Ref 89/1)**

Retail Trust as owner of the Crookfur Estate object to the Council identifying the Estate as a Conservation Area.

First opportunity Retail Trust have had to submit comments, no mention of it in MIR D12 is unnecessary:

1. Estate is protected by other Development management policies
2. Site is of local importance only not worthy of a conservation area.

LDP policies D1, D6 and D8 alongside SPGs provide protection for buildings that have local historic and cultural significance.

Similar policies in the Local Plan proved robust enough.

In order for the Estate to survive in its current form there is a need for buildings to be repaired, refurbished and sometimes replaced. This would be much more difficult to achieve if not impossible by CA status.

Question if buildings are so exceptional or rare that they warrant protection, no listed buildings, question if area is of significant architectural or historic interest. Not clear if designed by Basil Spence himself.

Small Conservation Area will have bigger impact on owner and will hinder the Estate to

be dynamic and respond to change.

CAA should be prepared in collaboration with Retail Trust if it goes ahead.

(e) Policy D12.2 Crookfur Cottage Homes

Support

Crookfur Residents Committee (Ref 54/1)

Support Crookfur becoming a conservation area. Cottages and estate are unique.

Crookfur Residents Committee (Ref 55/1)

Support Crookfur becoming a conservation area to maintain character and village environment.

Crookfur Residents Association (Ref 56/1)

Support Crookfur becoming a conservation area. Design Basil Spence created truly unique and should remain.

Modifications sought by those submitting representations:

(a) Policy D11: Management and Protection of the Built Heritage

Richard A Shaw (Ref 234/1)

Caldwell House and the importance of its historic landscape in immediate area, along with other RCAHMS sites, should be acknowledged in the plan or as appropriate elsewhere including on maps.

(b) Policy D11.6 Netherlee Article 4 Direction Area, Policy D12.1 Netherlee

Barbara Rourke (Ref 494/1) - Remove policy designation.

(c) Policy D11.21 Caldwell House, Uplawmoor

Richard A Shaw (Ref 234/2) - Clarity is required regarding wording of policy.

(d) Policy D12: New Conservation Areas

Retail Trust (Ref 89/1) - Remove Crookfur Cottage Homes from D12.

Summary of responses (including reasons) by planning authority:

(a) Policy D11: Management and Protection of the Built Heritage

Support

Nazir Ahmed (Ref 755/19)

The Council acknowledges and welcomes the support for Policy D11.

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

Objection**Richard A Shaw (Ref 234/1)**

It is not considered appropriate to list every entry from the Royal Commission on the Ancient and Historic Monuments of Scotland (RCAHMS) database within the plan and proposals maps. The importance of the historic landscapes around Caldwell House and other listed buildings is however acknowledged, and is taken into account in both planning applications and applications for listed building consent through the development management process. Scheduled monuments within East Renfrewshire are detailed within Schedule 4 of the Proposed Plan and are kept up to date on the Council's website. Further information is provided by both Historic Scotland's and RCAHMS's websites.

The Council considers that adequate detail is provided Proposed Plan, proposals maps and supporting supplementary guidance on the management and protection of the built heritage.

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

(b) Policy D11.6 Netherlee Article 4 Direction Area, Policy D12.1 Netherlee**Support****Alastair Graham and Monique Graham (Ref 13/1), Alistair Hendry (Ref 966/1)(966/2)**

The Council acknowledges and welcomes the support for Policy D11.6 and D12.1. The Council will carry out a conservation area appraisal for Netherlee before any formal designation is sought and will consult residents of the area as part of this process.

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

Objection

Barbara Rourke (Ref 494/1) - The proposal to designate a conservation area is contained as part of Policy D12: New conservation areas. Scottish Ministers expect local authorities to designate only those areas which they consider to be of special architectural or historic interest as conservation areas. The Ministers consider it important that before designation planning authorities should give the public ample opportunity to comment, either through responses to local plans, or where no local plans are in preparation, through another consultation process.

In this instance the Council has taken the opportunity to undertake this initial consultation through the Local Development Plan process. In doing so, the Council directly contacted all residents within the current Netherlee Article 4 direction area. For clarification, no change has yet been made to the designation of the area.

Changes to the planning legislation through the Town and Country Planning (General Permitted Development) (Scotland) Amendment Order 2011 mean that the current Article 4 Direction for Netherlee is now outdated. As a result of these changes, and having reconsidered all Article 4 areas within the Council area, it is proposed that conservation area designation would be the most effective way of ensuring that the Netherlee area continues to be protected from inappropriate development, and that the character and appearance of the area as a whole is preserved and enhanced. Therefore instead of re-issuing an updated Article 4 Direction under the new legislation, the Council is proposing

designating this area of Netherlee as a Conservation Area (and revoking the now outdated Article 4 Direction). The Council will carry out and consult upon a conservation area appraisal for Netherlee before any formal designation is sought. The appraisal will identify the special interest and changing needs of the area and will form the basis for its future management.

The conversion of front gardens into driveways is something that the Council hopes a conservation area designation will protect against, as these changes would significantly alter and have a detrimental effect upon the character and appearance of the area. A review of parking restrictions is currently being carried out by the Council's Roads department. The Planning department will work closely with the Council's Roads service to ensure that the proposed conservation designation is considered as part of this process.

Conservation area designation does not place a ban upon all new development within its boundaries; rather it allows change to be effectively managed to ensure that new development will not harm the character or appearance of the area. The Council as planning authority would then have a statutory duty to preserve and enhance the Netherlee conservation area.

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

(c) Policy D11.21: Caldwell House Uplawmoor

Objection

Richard A Shaw (Ref 234/2)

Schedule 5, reference D11.21 refers to limited development to secure listed building restoration. Policy D11 is supported by proposed supplementary planning guidance, which details that enabling development may be acceptable where it is demonstrated that it is required to offset the listed building restoration cost. In line with SPP, the resulting development would require to be of a high design quality, protect the listed building and its setting and be the minimum necessary to enable its conservation and re-use.

The Council recognises the difficulties involved with listed building restoration, and that there could be potential for conflict to emerge between the desire to restore the listed building and preserve the historic landscape. However, the restoration of the A listed building remains a priority for the Council and it will, in consultation with Historic Scotland, address the detail of any proposals at pre-application and planning application stage to ensure wherever possible that the landscape setting of the building is protected.

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

(d) Policy D12: New Conservation Areas

Support

Nazir Ahmed (Ref 755/20) - The Council acknowledges and welcomes the support for Policy D12.

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

Objection**Retail Trust (Ref 89/1)**

The purpose of the Main Issues Report (MIR) was to set out the Council's major strategic land use issues and the overall direction of the Local Development Plan. The MIR cannot therefore cover all policies and proposals. It was considered that the proposal for two new conservation areas could be fully consulted upon at proposed plan stage. The Council will carry out a conservation area appraisal for Crookfur Cottage Homes before any formal designation is sought. The Council will carry out a further consultation as part of this process with both residents of the area and the Retail Trust.

The proposed move to conservation area status has been supported by Historic Scotland. Although not listed the properties were included in a thematic listing survey with the resulting decision being that the estate should be recorded in full by the Royal Commission on the Ancient and Historical Monuments of Scotland (RCAHMS), and conservation area designation recommended to the Council. This site contains a bespoke settlement designed by the architectural practice of Sir Basil Spence, Glover & Ferguson in the modern Neo-vernacular style. The highly regarded scheme won a Civic Trust award for 1967.

There is no size limit on conservation areas, and the Council considers this unique estate within East Renfrewshire to be worthy of such a designation. The key elements of interest in the estate are the Basil Spence designed cottages and their spatial relationship including the large central green and mature gardens, elements which the Council would hope a conservation area designation would protect. Other buildings on the estate are of less architectural significance, but group well with the cottages, using similar materials and with a low massing. The 1980s Fraser blocks have good architectural details and form a sympathetic backdrop to the green.

Conservation area designation does not place a ban upon all new development within its boundaries; rather it allows change to be effectively managed to ensure that new development will not harm the character or appearance of the area. For the Council as planning authority, we would then have a statutory duty to preserve and enhance the Crookfur Cottage Homes conservation area.

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

(e) Policy D12.2: Crookfur Cottage Homes**Support****Crookfur Residents Committee (Ref54/1); Crookfur Residents Committee (Ref 55/1); Crookfur Residents Association (Ref 56/1)**

The Council acknowledges and welcomes the support for Policy D12.2

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

Reporter's conclusions:Policy D11: Management and protection of the built heritage; and Policy D11.21: Caldwell House Uplawmoor

1. Policy D11 in the proposed plan states:

“5.17 Policy D11: Management and protection of the built environment

5.17.1. The council will safeguard the special character of conservation areas and the Netherlee Article 4 Direction Area; sites included on the Inventory of Gardens and Designed Landscapes; scheduled monuments and archaeological sites; and listed buildings and their settings. Development likely to adversely affect these assets will be resisted...

...5.17.3. The council will seek to secure the implementation of the environmental protection projects shown on the proposals map and listed in Schedule 5.”

2. Schedule 5 of the proposed plan refers to environmental protection projects, one of which is Policy D11.21, which proposes limited development to secure listed building restoration at Caldwell House, Uplawmoor.

3. Adjustments are sought to the proposed plan which would: acknowledge the importance of the historic landscape around Caldwell House; and clarify what is meant by limited development to secure listed building restoration in Policy D11.21.

4. Both the 2010 Scottish Planning Policy and Scottish Planning Policy (2014) explain in relation to listed buildings that enabling development may be acceptable where it can be clearly shown to be the only means of preventing the loss of the asset and securing its long term future. Under Sections 14(2) and 59(1) of the 1997 Planning (Listed Buildings and Conservation Areas) (Scotland) Act, where listed building consent and planning permission are sought, special regard must be given to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

5. Caldwell House is a nationally important Category A listed building. It is in a state of disrepair and has been identified as a building at risk. The historic parkland nature of its landscape is also recognised. I am satisfied that Schedule 5 of the proposed plan reasonably establishes the principle of restoring the building and allowing limited development to secure this objective. I consider that unnecessary and inappropriate detail would be introduced if the entries for Caldwell House (and other sites), in the database of the Royal Commission on the Ancient and Historical Monuments of Scotland, were included in the proposed plan. I believe that the extent to which the land around the house should be used for development is best decided at the time listed building and planning applications are considered. A robust framework for assessing such applications would be provided by, amongst other things, Schedule 5, which refers to limited development, Policy D11, which seeks to safeguard listed buildings and their settings, and the statutory tests (Sections 14[2] and 59[1] above). I also note that national guidance sets out the way in which enabling development should be approached, and this is elaborated on in the proposed supplementary guidance on management and protection of the built environment. In the circumstances, I am satisfied that no further clarity on the extent of development, or information on the landscape,

around Caldwell House is required in Schedule 5, Policy D11.21, or other parts of the proposed plan.

6. Overall, no adjustment is required to the proposed plan.

Policy D11.6: Netherlee Article 4 Direction Area; Policy D12: new conservation areas; Policy D12.1: Netherlee Conservation Area; and Policy D12.2: Crookfur Cottage Homes Conservation Area

7. Policy D12 in the proposed plan states:

“5.18 Policy D12: New Conservation Areas

5.18.1. The council will promote the designation of the following new conservation areas as shown on the proposals map and Schedule 6:

- Netherlee Conservation Area – D12.1
- Crookfur Cottage Homes Conservation Area – D12.2

5.18.2. Further guidance and control will be set out in a conservation area appraisal which will be prepared for each area.”

8. Schedule 2 of the proposed plan and Policy D11 refer to the Netherlee Article 4 Direction Area (Policy D11.6). Schedule 6 refers to Policies D12.1 and D12.2, the proposed new conservation areas.

9. Adjustments are sought to the proposed plan which would delete the proposed conservation areas at Netherlee and Crookfur Cottage Homes. The representations do not seek to remove or adjust the Netherlee Article 4 Direction Area.

10. Both the 2010 Scottish Planning Policy and Scottish Planning Policy (2014) indicate that the planning system should promote the care and protection of the historic environment, and enable positive change which ensures that its special characteristics are protected, conserved or enhanced. Additionally, Scottish Planning Policy (2014) indicates that local planning authorities should designate and review existing and potential conservation areas, and that this should be supported by conservation area appraisals and management plans. The 1997 Planning (Listed Buildings and Conservation Areas) (Scotland) Act requires a local planning authority to designate as conservation areas only those areas which it considers to be of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. Scottish Historic Environment Policy indicates that, before designation, it is important that a planning authority give the public ample opportunity to comment

11. The proposed Netherlee Conservation Area is characterised by 2 storey, red sandstone terraces. It is an attractive and distinctive area, with a broadly uniform and coherent character and appearance. The area is already covered by an article 4 direction which makes certain classes of permitted development subject to planning controls. I am satisfied that the area is of sufficient architectural and historic interest to justify promoting it as a conservation area in Policy D12, and that it is desirable to preserve or enhance its character and appearance. The planning authority has appropriately reviewed the article 4 direction, and reasonably concluded that the area would benefit from becoming a conservation area. I consider that the changes introduced through the 2011 Town and

Country Planning (General Permitted Development)(Scotland) Order, which have increased the extent of planning controls in conservation areas, support its inclusion in the proposed plan as a potential conservation area. Designation would be likely to help protect the area from unsympathetic minor changes to properties which, individually and cumulatively, have the potential to undermine its character and appearance.

12. I do not believe that the representations are insurmountable obstacles to the promotion of Netherlee as a conservation area. They include letters of support as well as of objection. While there is a difference of view on the extent to which the public have been consulted on the proposal, the planning authority explains that further consultation on the proposed conservation area appraisal will be carried out before any formal designation is sought. It also explains that it will work closely with the roads authority to ensure that the proposed conservation area designation is considered as part of the review of parking restrictions in the area. While there may be some additional costs if the conservation area is approved, I am not persuaded that these would outweigh the likely benefits of designation, particularly the increased potential for preserving or enhancing the area's character and appearance. In all the circumstances, I do not consider that the proposed Netherlee Conservation Area should be deleted from Policy D12.

13. The proposed Crookfur Cottage Homes Conservation Area is based upon cottages positioned around a central green and group of buildings. They have predominantly used traditional building materials such as white harling and slate, but have included elements of more modern design, such as mono-pitched roofs. The cottage and other buildings sit in pleasant wooded grounds, are attractive, have a uniform and coherent character and appearance, and are unique in East Renfrewshire. The older part appears to have been designed by the firm of Sir Basil Spence, Glover and Ferguson in 1964, for the Linen and Woollen Drapers Association, and work was completed in 1967, when the development received a Civic Trust award. The more recent part was added in the 1980s, and is similar in style. The planning authority explains that the proposed conservation area has support from Historic Scotland, and that the development has been recorded in full by the Royal Commission on the Ancient and Historical Monuments of Scotland. I am satisfied that the cottage homes are of sufficient architectural interest to justify promoting them as a conservation area in Policy D12, and that it is desirable to preserve or enhance their character and appearance.

14. I do not believe that the representations are insurmountable obstacles to the promotion of Crookfur Cottage Homes as a conservation area. They include letters of support as well as of objection. While this is the first opportunity to make representations on the proposal, the planning authority explains that further consultation on the proposed conservation area appraisal will be carried out before any formal designation is sought. I accept that other policies in the proposed plan, including Policy D1 (detailed guidance for all development) would still help to control development in this area if no conservation area was designated. However, I consider that designation would allow greater focus to be placed on preserving or enhancing the character and appearance of the area as a whole. Although there may be some additional costs if the conservation area is approved, I do not believe that designation would prevent appropriate development taking place, including sympathetic repairs, refurbishments and possible replacements. In my view, the benefits that would arise from a focus on preserving or enhancing the area's character and appearance would likely outweigh the costs of designation. In all the circumstances, I do not consider that the proposed Crookfur Cottage Homes Conservation Area should be deleted from Policy D12.

15. Overall, no adjustment is required to the proposed plan.

Reporter's recommendations:

No modifications.

Issue 7	COMMUNITY, LEISURE AND EDUCATIONAL FACILITIES	
Development plan reference:	Policy D13: Community, Leisure and Educational Facilities Schedule 7: New and Improved Community, Leisure and Educational Facilities	Reporter: Katrina Rice
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Proposed Plan Stage</u> A M Lyall (Ref 6/1) SEPA (Ref 70/11) (Ref 70/12) (Ref 70/14) Theatres Trust (Ref 136/1) Margaret Gray (Ref 231/2) Thornliebank Community Council (Ref 504/5) James Sandeman (Ref 600/14) Sport Scotland (Ref 702/8) Mactaggart and Mickel Homes Limited (Ref 703/13) Nazir Ahmed (Ref 755/1) Barrhead Community Council (Ref 924/5) Auchenback Tenants and Residents Association (Ref 938/5)</p> <p><u>Appendix 1 – Standard Letter</u> Standard Letter Comment D13A (18 reps) (Ref 986/1) (Refer to Appendix 1)</p> <p><u>Modification Stage</u></p> <p><u>D13.4</u> The Coal Authority (Ref 59/4) SEPA (Ref 70/57) SportScotland (Ref 702/11) Alan Kirkwood (Ref 1287/1) Alison Drummond (Ref 2538/3) Savio D'Souza (Ref 3952/1) Ms Crerar (Ref 4084/1)</p> <p><u>Appendix 2 – List of Representees</u> Policy D13.28 - South Waterfoot Road, Newton Mearns Policy D13.29 – Capelrig Road Newton Mearns</p>		
Provision of the development plan to which the issue relates:	Chapter 5: Placemaking and Design Para. 5.19 – 5.20.3 D13.14 Rouken Glen, Giffnock D13.23 Broomburn Drive, Newton Mearns D13.3 Barrhead Town Centre D13.7 Barrhead to Pollok Policy D13.8 Centenary Park, Carlibar Park , Barrhead <u>Modifications</u> Policy D13.4 – Barrhead High School D13.28 - South Waterfoot Road, Newton Mearns Policy D13.29 – Capelrig Road Newton Mearns	

Planning authority's summary of the representation(s):**(a) Policy D13: Community, Leisure and Educational Facilities****Support****Theatres Trust (Ref 136/1)**

Support Community, Leisure and Education Facilities which will safeguard existing facilities. However, para 5.20.2 states if facilities are no longer viable. Theatres are rarely viable and usually exist on grants and various forms of funding.

ERs theatre supports the services around it including restaurants, pubs, printers, caterers and taxis and is a part of community and evening economy.

Objection

Sport Scotland (Ref 702/8) - The second and third bullet points in paragraph 5.20.1 should be amended to make reference to the needs analysis provided in the East Renfrewshire Sports Facility and Pitch Strategy.

Nazir Ahmed (Ref 755/1) - Eastwood High: After the replacement Eastwood High School is constructed, a residual part of the site will remain between the School and Barcapel Avenue/Flats. Having consulted the Muslim community, we believe this site would be most suitable for establishing an East Renfrewshire Mosque and Community Centre (ERMEC) facility, since it is centrally located and conveniently accessible for all East Renfrewshire Muslim community residents. The site is currently not well used, and is not overlooked, with the nearest housing being Barcapel flats, with no flooding issues. Further, ERC's ownership of the site would help expedite its sale to the ER Muslim Community for constructing a religious and community facility. We therefore propose the designation of Eastwood High to be amended to allow the establishment of ERMEC, and hence object to the current policy designations for this site.

Standard Letter Comment D13A (18 reps) (Ref 986/1) - Education facilities insufficient at present with residents unable to find places at local schools.

(b) Policy D13.14 Rouken Glen, Giffnock**Support**

Thornliebank Community Council (Ref 504/5) - Support improvements but consider park to be in Thornliebank

(c) Policy D13.23 Broomburn Drive, Newton Mearns**Support**

Margaret Gray (Ref 231/2) - Ageing population will benefit without having to travel great distances.

Objections

A M Lyall (Ref 6/1) - As someone who was born and brought up in the countryside I feel it is a retrograde step to build on what is basically parkland. Parks are few and far

between and should be preserved for future generations.

SEPA (Ref 70/14) - Assessment of flood risk required.

James Sandeman (Ref 600/14) - Question council ability to support alongside Lygates

(d) Policy D13.3 Barrhead Town Centre

Objection

Barrhead Community Council (Ref 924/5), Auchenback Tenants and Residents Association (Ref 938/5) - No details of proposals in plan - appreciate details at an early date to allow consideration of impact on sheltered housing and salvation Army Centre.

(e) Policy D13.7 Barrhead to Pollok

Objection

SEPA (Ref 70/11) - Assessment of flood risk required.

(f) Policy D13.8 Centenary Park, Carlibar Park , Barrhead

Objection

SEPA (Ref 70/12) - Assessment of flood risk required.

(g) New Site - Waterfoot Road, Newton Mearns

Objection

Mactaggart and Mickel Homes Limited (Ref 703/13) - Identify site at Waterfoot Road as site for school (figure in rep)

Modification Stage

(h) D13.4 - Barrhead High School (Technical Modification)

General

The Coal Authority (Ref 59/4) - Reviewed the three proposed modifications and can confirm that, as none of the three sites are affected by recorded coal mining legacy hazards, The Coal Authority has no specific comments or observations to make on this consultation.

SportScotland (Ref 702/11) - sportscotland has no comments to make on this minor technical modification to the Plan

Savio D'Souza (Ref 3952/1) - Support the council position and principle to rebuild and enhance Barrhead High school to improve the education opportunities for the people of Barrhead

Objections

SEPA (Ref 70/57) - There is no known flood risk to allocation D13.4 however the majority of the associated greenspace is within the fluvial extent of the Aurs Burn. We therefore require either the submission of further information to assess flood risk or confirmation of appropriate uses which can be realised without the need for landraising or other works which would adversely impact flood storage and conveyance.

Alan Kirkwood (Ref 1287/1)

Support the need for a new Barrhead High School
 Concerns over location of new school
 Impact on Cowan Park
 Ownership issues identified
 Other options available
 Design and location of the school are important issues

Alison Drummond (Ref 2538/3)

Any boundary change should not encroach into Cowan Park
 Greenspace should be preserved

Savio D'Souza (Ref 3952/1)

Concerned about the general principle of land swaps
 Concerned about the impact moving the bandstand may have effect on the ambience of future events
 If bandstand does have to be moved then greater consultation with the wider community required to ensure good understanding

Ms Crerar (Ref 4084/1)

Impact the proposed site will have on the Cowan Park
 Charrette meetings have been purely about design
 No consultation with the people of Barrhead to date about the potential impact of the building of the proposed new high school within the grounds of Cowan Park, which was gifted to the people of Barrhead by James Cowan
 Park belongs to the people of Barrhead, yet East Renfrewshire Council have not consulted with us
 New site and building will effectively half the existing park's green space areas, and divide up the Cowan Park into grounds for the proposed new high school other more realistic and less damaging alternatives to this
 Barrhead people believe that unless they agree to the school plans as they are, there will be no new school and that it doesn't matter what they say or do, as the school will be built anyway.
 People of Barrhead are being left out of the consultation process

(i) Policy D13.28 - South Waterfoot Road, Newton Mearns
(Full list of representees set out in Appendix 2 with representations set out in Appendix 3 and summarised key points set out below.)

General

- The Coal Authority and Sport Scotland raised no concerns.

Summary of Supporting Representations

- Support for alternative school location;
- Support subject to detailed road design considerations being addressed and designed to the appropriate standards;
- Immediate need for a denominational primary given the pressure on denominational places in the area; and
- Provides a logical spread of denominational primary schools across the Eastwood area.

Summary of Objections

- Contrary to the current Local Plan, Main Issues Report proposals and the Proposed Local Development Plan;
- Proposed site erodes greenbelt;
- Allows easier release of surrounding area for housing;
- Plan does not deal in detail with increased infrastructure requirements;
- Need for adequate traffic flow and parking system for the schools;
- Increase in traffic;
- Exacerbate the congestion that already exists on Waterfoot Road;
- Dangerous for residents, children, pedestrians and motorists;
- Unwanted traffic safety measurements will be required;
- Location is not within the heart of the community;
- Prominent site and visually obtrusive;
- No details on school catchments and possible changes;
- ERC should not be considering development within the greenbelt in interests of planning gain;
- Schools based on religious reasons should not be built – prevents integration and equality;
- No proven need for denominational schools and no nearby denominational secondary schools for pupils to progress into;
- Is a better site for a non-denominational primary as increased traffic could potentially be limited with families dropping off at both primary and secondary schools;
- Concern over joint campus for two denominational schools;
- Crookfur would be a better location;
- Removes possibility of a shared campus at Maidenhill;
- Guarantees required that there would always be a Catholic head teacher or someone chosen by the Catholic Church; and
- Site includes the “Alton Steading” identified by Historic Scotland as the “Auld toum” of Mearns (which was replaced by “Newton Mearns”

(j) Policy D13.29 – Capelrig Road Newton Mearns

(Full list of representees set out in Appendix 2 with representations set out in Appendix 3 and summarised key points set out below.)

General

The Coal Authority, Sport Scotland and Shaheena Malik raised no concerns.

Summary of Supporting Representations

- Site appropriate for the purposes of a religious community facility;
- Centrally located and accessible;
- There was a need for this type of facility to serve the local Muslim population;

- No current facility of this kind for local ER Muslim Community;
- Provide educational, cultural and social benefits for the wider East Renfrewshire community;
- Co-location of uses can bring significant benefits to whole community;
- Support the current policy designations (Policies D5 and D8) to be amended to Community Use (Policy D13);
- Majority of religious activities outwith school hours – therefore unlikely to raise any road/traffic concerns;
- Site is not overlooked or near any existing houses;
- Leslie Avenue could be used by school as additional recreational resource;
- Other associated facilities e.g. butchers will not be provided;
- Enable the establishment of an appropriate and much needed non-sectarian facility for the religious and spiritual needs of the local Muslim community.

Summary of Objections

- The site is designated for educational purposes and earmarked for education and recreational use as required by Curriculum for Excellence and GIRFEC;
- The significant costs of landscaping would be money wasted if the proposal was to go ahead;
- The site is an integral part of the campus for outdoor learning, social and recreation space and is not residual or adjacent land;
- Steep gradient and therefore not suitable for development;
- Area is the only open space for pupils;
- To tackle obesity required outdoor activity, and this space is safe and secure;
- Green space required for pupils during summer months;
- The Council should focus on investing in education and exercise rather than religion
- Science department already using the area;
- The area has protected bats living there;
- Contrary to ERC Planning Brief which states "informal open space should form an internal part of the design";
- There is no alternative location to replace any lost recreational space;
- Religious facility should not be located within grounds of non denominational school;
- Siting a homeless soup kitchen in the grounds of a secondary school, and near a primary school puts children at risk, and is not an appropriate use;
- Inappropriate site for a Halal butcher;
- A mosque would only serve a small part of the community, and would not be inclusive of everyone - Concern is that the Shia community will not be included in the proposal resulting in exclusion;
- Site is not established for community use;
- Such public access so close to a school is a security risk to school children, contrary to the Cullen Report;
- Building would reduce the facilities for the school and inhibit any future expansion;
- Campus given Architects Design Award;
- Increased competition for places at Eastwood High School resulting in some of the current catchment area being relocated to Barrhead High School
- Increase in traffic would raise safety issues for pupils;
- Shared access unacceptable;
- Future maintenance issues concern;

- Safe route to school from station would be increasingly dangerous;
- Roads are in a poor state already;
- Inadequate parking;
- Increase in traffic would be unacceptable;
- Potential flooding problem caused by additional development of the site;
- Reduce property values;
- Rights of children should be respected;
- Monetary gain of the Council should not be at expense of children's education;
- More politicians should have attended the public meeting;
- Many in Muslim community are against the proposal;
- Good relations between various ethnic groups will be adversely affected;
- Little openness and transparency about the proposal;
- Building would reduce the facilities for the school and inhibit any future expansion - required due to number of new homes coming through LDP;
- Off market proposal would not meet Council priorities of best value;
- Contrary to Policy D13 of LDP;
- Glasgow Central Mosque only 5 miles away – other mosques in area;
- Impact upon ground heat recovery system which was designed to save energy costs for the school;
- Sets a dangerous precedent for all other school campus;
- Alternative site already allocated in LDP at Maidenhill – close To Junction 5 and therefore people from Glasgow can access site without impacting upon local roads; allow new community to be established with minimal or no local objection; and
- Alternative sites have been identified e.g. Patterton Farm (better parking) and Fair-weather Hall – both available now.

Modifications sought by those submitting representations:

(a) Policy D13: Community, Leisure and Educational Facilities

Theatres Trust (Ref 136/1) - Bullet point 2 of Policy should recognise that Theatres are rarely viable.

Sport Scotland (Ref 702/8) - The second and third bullet points in paragraph 5.20.1 should be amended to make reference to the needs analysis provided in the East Renfrewshire Sports Facility and Pitch Strategy.

Nazir Ahmed (Ref 755/1) - Consider the residual Eastwood High site to be most appropriate for the purposes of a religious facility and propose that the policy designations for this site [Policies D5 and D8] be amended to Community Use (Policy D13) amendment:

“The provision of community (including religious), leisure and educational facilities, including for the growing underrepresented minority ethnic communities, will be a core component of any master plan.”

Standard Letter Comment D13A (18 reps) (Ref 986/1) - Limit development of housing until there is certainty of provision of school places for current residents and capacity for additional new pupils.

(b) Policy D13.14 Rouken Glen, Giffnock

Thornliebank Community Council (Ref 504/5) - Park should be recognised as being within Thornliebank

(c) Policy D13.23 Broomburn Drive, Newton Mearns

A M Lyall (Ref 6/1), James Sandeman (Ref 600/14) - Remove proposal from Schedule 7 and retain as open space under Policy D5.

SEPA (Ref 70/14) - Flood risk assessment required.

(d) Policy D13.3 Barrhead Town Centre

Barrhead Community Council (Ref 924/5), Auchenback Tenants and Residents Association (Ref 938/5) - Further details of proposals required to allow for consideration of impact on sheltered housing and salvation Army Centre.

(e) Policy D13.7 Barrhead to Pollok

SEPA (Ref 70/11) - Flood risk assessment required.

(f) Policy D13.8 Centenary Park, Carlibar Park , Barrhead

SEPA (Ref 70/12) - Flood risk assessment required.

(g) New Site - Waterfoot Road, Netwon Mearns

Mactaggart and Mickel Homes Limited (Ref 703/13) - Add School Site to Waterfoot Road, Netwon Mearns under Schedule 7.

(h) Policy D13.4 – Barrhead High School

SEPA (Ref 70/57)

Require either the submission of further information to assess flood risk or confirmation of appropriate uses which can be realised without the need for landraising or other works which would adversely impact flood storage and conveyance.

Alan Kirkwood (Ref 1287/1), Alison Drummond (Ref 2538/3), Savio D'Souza (Ref 3952/1), Ms Crerar (Ref 4084/1)

Greater detail required on location and design of school building and associated facilities within Cowan Park.

Further consultation required.

(i) Policy D13.28 - South Waterfoot Road, Newton Mearns

Various – See Appendix 2 - Remove site D13.28 from Schedule 7 and redesignate as Green Belt.

(j) Policy D13.29 – Capelrig Road Newton Mearns**Various – See Appendix 2**

Remove site D13.29 from Schedule 7 and redesignate as Urban Green Space under Policy D5.

Site should be allocated within Malletsheugh/Maidenhill Master Plan under Policy M2.1.

Patterton SPV Ltd (in administration) (Ref 776/3) - Inclusion of land at Patterton for Religious/Community Facility as a component of larger mixed use proposal.

Andrew Cory (Ref 3354/2) - Further details on size, scale and use required before Roads Service could be satisfied.

Summary of responses (including reasons) by planning authority:**(a) Policy D13: Community, Leisure and Educational Facilities****Support****Theatres Trust (136/1)**

The Council acknowledges and welcomes the support for Policy D13. Viability is used as a broad term and would be based as a consideration of all factors including grants etc.

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

Objections**Sport Scotland (702/8)**

Policy D13 provides clarity and certainty to ensure that alternative local provision is provided where necessary. The East Renfrewshire Sports Facility and Pitch Strategy will continue to inform future action within the Council area.

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

Nazir Ahmed (755/1)

This representation from the Muslim community stated that their preferred site for a Religious and Community Facility would be on a residual parcel of land between the new Eastwood High School and the Barcaple Avenue/Flats.

This site is partly in the 'General Urban Area' under Policy E1 of the Adopted Plan and partly on 'Protected Open Space' under Policy L1 of the Adopted Plan and D5 of the Proposed Plan and is located adjacent to the new Eastwood High School. Policy M2.1 of the Proposed Plan makes provision for a site to be allocated for a religious facility within this master plan area.

The response also stated that if the preferred site is not achievable, then they would be supportive of the allocation at Maidenhill/Malletsheugh (Policy M2.1). They state they are

not in favour of a site at Barrhead South (M2.2) or Shanks/Glasgow Road (M3).

The site previously had school buildings and a car park located upon it. The school buildings have moved to the south-east closer to Capelrig House and the area of land left is being grassed and landscaped.

In January 2013 the Council refused an application for a change of use from a former social club to a place for religious activities with associated community, social and education services at 8 Lanrig Road, Newton Mearns. However, in August 2013 the Reporter upheld an appeal by the applicant and granted temporary planning permission for the development for three years.

In arriving at that decision the Reporter drew attention to the fact that the adopted Local Plan recognised the need for a Muslim community facility and provided a clear commitment to continue to work with the Muslim community in seeking to identify an appropriate site. The Reporter also highlighted that there has been demand for a Muslim community facility for over a decade in Newton Mearns and no site has been allocated for such a facility. In addition, he noted the need for this facility for the local Muslim community and the lack of any readily available alternative location for it.

In granting the temporary consent the Reporter also advised that this would allow time to enable meaningful discussions between the Muslim community and the Council to try and find a suitable location for a Muslim community facility.

At the Council meeting of 11th September 2013 it was agreed that the site should be subject to a Modification to the Plan and a further 6 week consultation period be undertaken. Further information is set out in the Modifications Summary (CD/20) and SEA Addendum (CD/17).

Representations received to the Modification stage are addressed below under D13.29.

Standard Letter Comment D13A (18 reps) (986/1)

A high level of concern has been raised over the provision of education for incoming children given the capacity issues perceived in many of the local schools. The Proposed Plan recognises this and has identified the need for the onsite provision of 2 new Primary schools with associated pre-5 provision in Newton Mearns. The need for these schools has been assessed by the Council's education department and they have further advised that Secondary capacity can be managed within the existing school estate, subject to appropriate development contributions.

A modification to the Proposed Plan proposes that the denominational Primary School is delivered in an off-site location but on a site that is in a preferred educational location at Waterfoot Road, Newton Mearns. Discussions are ongoing over the acquisition of that site to target delivery of the school by the start of school term 2017. The Council has allocated the required capital cost within the capital plan. This will meet the required denominational education requirements. This issue is discussed further below under the response to D13.28 which concludes that the site be retained in the Plan as suitable for a new school. The Council is of the view that the Plan adequately addresses Education issues.

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

(b) Policy D13.14 Rouken Glen, Giffnock**Thornliebank Community Council (504/5)**

The support to this Policy is welcomed. In relation to settlement location of Rouken Glen Park the Council can confirm that there is no distinct boundary separating Giffnock and Thornliebank. However the Council sees merit in the representation and would be supportive of further clarity being included on this issue.

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 because it would not have any implications for the site or other policies within the LDP.

A separate entry for D13.14 Rouken Glen is included in Schedule 7 under the Thornliebank heading as well as Giffnock.

(c) Policy D13.23: Broomburn Drive, Newton Mearns**Support**

Margaret Gray (231/2) - The Council acknowledges and welcomes the support for Policy D13.23.

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

Objections**A M Lyall (Ref 6/1)**

The Council agrees that parks should be protected and the Proposed Plan does this through Policies D4: Green Network, D5: Protection of Urban Greenspace and D6: Protection of Local Greenspace.

Although Policy D13.23 seeks to utilise an element of greenspace for community purposes in the form of a new health centre/nursery school, it is the Council's view that this could be accommodated without significant detrimental impact on the greenspace. The appropriateness of the site for these uses was considered at the Local Plan Examination of the Adopted Local Plan in 2010 and was found to be an appropriate arrangement.

A Planning Brief (CD/35) has also been prepared for the site and will be updated to ensure that the relevant planning policies are considered and future development takes cognisance of particular aspects of the site including impact on greenspace.

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

SEPA (70/14) - In this particular case, it is acknowledged that there may be an issue with respect to flooding. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals. The comments of SEPA will be taken fully into account in the decision-making process.

If the Reporter is so minded to recommend that the Representation from SEPA is accepted and the Plan modified to reflect the need for a Flood Risk Assessment, the

Council would be supportive of this modification because it would not have any implications for the wider area or other policies within the LDP.

In Schedule 7

Add F: Flood Risk Assessment Required.

James Sandeman (600/14)

The Council is satisfied that a need exists for development of a new health centre/nursery school. The Community Health Care Partnership and Health Board have been consulted as part of the Local Development Plan process and no issues have been raised.

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

(d) Policy D13.3: Barrhead Town Centre

Objections

Barrhead Community Council (924/5), Auchenback Tenants and Residents Association (938/5)

This proposal forms part of a wider application for development which incorporates construction of a new supermarket (Asda), 2012/0591/TP (CD/88). This application has been approved and work commenced on site in early 2014.

As part of the development management process there was consultation with the community on design matters including the creation of a civic square. This was a major planning application and consequently consultation sessions were arranged at Proposal Of Application Notice and thereafter following submission of the full planning application.

The Council can confirm that access arrangements to the sheltered housing and Salvation Army building remain intact and consequently it is anticipated that there will be little impact upon either of these buildings.

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

(e) Policy D13.7: Barrhead to Pollok

Objection

SEPA (70/11)

In this particular case, it is acknowledged that there may be an issue with respect to flooding. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals. The comments of SEPA will be taken fully into account in the decision-making process. However, any flood risk issues regarding the new walkway could be addressed at planning application stage.

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

(f) Policy D13.8: Centenary Park, Carlibar Road, Barrhead**Objection****SEPA (70/12)**

In this particular case, it is acknowledged that there may be an issue with respect to flooding. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals. The comments of SEPA will be taken fully into account in the decision-making process. However, any flood risk issues regarding the park and green space improvements could be addressed at planning application stage.

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

(g) New Site – Waterfoot Road Newton Mearns**Mactaggart and Mickel Homes Limited (703/13)**

This representation from MacTaggart and Mickel proposed an alternative location for a denominational primary school outwith the master plan area at Maidenhill/Malletsheugh (M2.1). The alternative site lies within the designated green belt at Waterfoot Road, close to Mearns Castle High School and a housing site (Proposed Plan ref SG1.30). The site is owned by Mactaggart and Mickel.

Considerable pressure exists in the school estate, particularly within the denominational sector and this needs to be immediately addressed. A denominational school is an immediate priority to address current and future needs. This new denominational primary school is required regardless of any development in the master plans areas. In that respect the Council has confirmed provision of £9.5m within its Capital Plan.

Policy M2.1 states that the master plan will have to provide the on-site provision of 2 primary schools (a denominational and a non denominational) and associated pre-five provision as an early priority. This matter is addressed further under Issue 3.3 and within the Development Framework (CD/21).

At the Council meeting of 11th September 2013 it was agreed that the alternative school site should be subject to a Modification to the Plan and a further 6 week consultation period be undertaken. Further information is set out in the Modifications Summary and SEA Addendum.

Representations received to the Modification stage are addressed below under D13.28. This issue concludes that the site identified remains suitable for a new Primary School.

Modification Stage**(h) D13.4 - Barrhead High School (Technical Modification)**

A proposal for the replacement school was included within the Proposed Plan. At that stage the agreed location was not known and therefore an indicative symbol was presented on the Proposals Map. This modification sought to show the Proposal of Application Notice (PoAN) boundary on the modified Proposals Map and update the description to read Replacement school and associated greenspace enhancement. This is supported by a Development brief for the site (CD/42).

Support

The Council notes and welcomes support for the need for a New Barrhead High School.

Objections**Design and Location of the Replacement High School**

A number of concerns have been raised in relation to the location and design of the replacement Barrhead High School.

The PoAN submitted by the Council identified the preferred location of the replacement school and associated greenspace enhancement. The location identified is within Cowan Park which is covered by Policies D5: Protection of Urban Greenspace and D4: Green Network and D10: Environmental Projects (D10.1, Dams to Darnley Country Park). These Policies seek to safeguard key components of the natural environment and will support proposals which will enhance these assets.

Further to this a planning application (2013/0737/TP) (CD/100) for the erection of a replacement school and associated facilities was approved on 2nd April 2014.

Whilst the location of the replacement campus encroaches on Cowan Park, the proposal will also see the provision of new outdoor sports facilities and the creation of a new area of greenspace on the footprint of the existing Barrhead High School campus.

The Council maintains that the new campus will enhance access, increase the diversity and frequency of use of Cowan Park and will not result in an adverse impact or significant loss of greenspace. The design works undertaken to date have allowed the Council to consider holistically a range of enhancements to Cowan Park which will compliment proposals for the replacement High School. These are considered further below.

A key concern throughout the design process has been the integration of the new campus within the Park and extensive consultation has been undertaken to date on this issue.

Design Charettes were run which were attended by pupils and teachers from the High School, together with the Parent Council. At this time there was positive discussion around the concept, internal pupil space and external environment.

Following on from this, further public consultation took place and influenced elements of the design process. The siting of the replacement school building has in particular been the subject of considerable discussion and designs have been drawn up which seek to fully integrate the building within the landscape and allow clear access routes to the school building and Cowan Park.

The vision is to develop a facility which functions both as a school and as a resource for the wider community. A range of sports provision, including school facilities and the adjacent sports pitches will form "Barrhead Sports Hub" and will function as a wider community resource.

Impact on Cowan Park

To compliment proposals for the new Barrhead High School and new greenspace created as part of this development, the Council has begun work on a master plan for Cowan Park.

The Park currently provides a variety of recreational uses and interest, however the Council is keen to identify opportunities to enhance and develop these further. The Council recognises that the Park is used by people of all ages, all of whom enjoy different aspects of it. The planning and building process will enable the Council to integrate the two projects and will develop proposals which build upon the quality of landscape, buildings and recreational uses which currently exist, but will also seek to improve facilities for visitors and encourage increased all year round activity.

Work is currently underway to identify a broad range of proposals; the Council will work with the Friends of Cowan Park, the Community Council and the wider community to develop these in more detail. Whilst development of the master plan is not an integral part of the new Barrhead High School proposals, it will be significantly informed by them and as a result, the timescale for the development and implementation of the master plan will be programmed around this.

Ownership Issues

The Council is proceeding to Inner House Proceedings.

Alternative Locations

Before settling on the preferred location for the replacement Barrhead High School the Council considered a range of alternative locations.

An Options Appraisal was initially undertaken in May 2012, however since then there have been changes in both land use and ownership within the local area which the Council considered might influence the preferred location for the proposed new school. Consequently, a further appraisal was carried out in October 2013 to clarify whether Cowan Park remains the optimal site for the proposed replacement school.

This Options Appraisal considered a range of alternative sites within Barrhead however it concluded that the land adjacent to the existing school within Cowan Park remains the most viable option in terms of deliverability, cost and location as well as providing a significant benefit to the locality in terms of greatly enhanced social amenity through the proposed campus facilities.

SEPA (Ref 70/57)

In this particular case, it is acknowledged that there may be an issue with respect to flooding. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals. The comments of SEPA will be taken fully into account in the decision-making process. This issue is further detailed in the Development brief under Section 6 and Plan C.

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 because it would not have any implications for the wider area or other policies within the LDP.
In Schedule 7

Add F: Flood Risk Assessment Required.

The Council is supportive of the suitability of this site for a High School and supports its retention in the Modified Proposed Plan.

(i) D13.28 - South Waterfoot Road, Newton Mearns - Provision of a New Denominational Primary School

Support

Support for the need for a new denominational Primary School is noted and welcomed

Objections

Roads and Transport Issues

It is acknowledged by the Council, in the response from the Roads Service, that the proposed use would add to the pressure on the local road network and therefore a transport assessment would be required to consider the likely strategic impacts of this proposal. In addition to that, a Transport Assessment would be required to fully evaluate the detailed impact of the school (joint denominational) and nursery school in terms of number of pupils, generated trips, car parking provision, drop-off and pick-up arrangements, and servicing and sustainable travel modes.

The Roads Service is generally supportive of this proposal subject to detailed design considerations being addressed and designed to the appropriate standards. Parking and drop off/pick up facilities, well designed within the school grounds, is crucial in respect of ensuring that there are no problems on the existing public roads.

These are all matters that would be incorporated in a Development Brief informed by a Transport assessment for the site and which will be considered at detailed planning application stage.

Greenbelt and Planning Issues

The Council acknowledge that the proposed school is located within the green belt. Care will be taken in the Development Brief to ensure that issues relating to design, traffic and access will be addressed. Furthermore, a future defensible green belt boundary and strong landscaped edge will be required. Delivery of a new school will provide significant community benefit. Issues of archaeology will be addressed through the Planning Brief and at planning application stage.

Educational Issues

The Education Department have indicated that there is an immediate need for a denominational primary given the pressure on denominational places in the area. They are supportive of this allocation as it provides a logical spread of denominational primary schools across the Eastwood area. The Education Department is supportive of modification D13.28 to the proposed Plan.

St Cadoc's Primary School is the only denominational primary serving the Newton Mearns area. This school has previously been extended and has very high occupancy levels.

The point regarding this being a better location for a non denominational primary is noted but when the provision across the Council area is examined, this site provides a very good spread for denominational provision and allows an immediate need to be addressed. The non denominational school is required by 2019 and will be located within the Maidenhill master plan area. Discussions are ongoing over the acquisition of that site to target delivery of the school by the start of school term 2017. The Council has allocated

the required capital cost within the capital plan.

The other matters are not appropriate matters to be considered by the LDP but are matters that will be fully addressed by the Education Department. It is noted that the Education Department would undertake an education statutory consultation exercise to establish the new provision and proposed changes to the existing catchment area. This exercise is required to establish any new educational provision and irrespective of the actual new location ultimately approved.

The Council is aware of the sensitivity of the site and a planning brief will be prepared as stated above.

The Council is supportive of the suitability of this site for a Primary School and supports its retention in the Modified Proposed Plan.

(j) D13.29 – Capelrig Road Newton Mearns - Provision of a Religious/Community Facility

(Full list of representees set out in Appendix 2 with objections in Appendix 3.)

A significant volume of representations was received for this site both in support and against this proposal.

Support

The Council notes and welcomes support for this Proposed Modification. It was stated that the site was appropriate for the purposes of a religious community facility, was centrally located and accessible and there was a need for this type of facility to serve the local Muslim population. It was also stated the proposal would provide educational, cultural and social benefits for the wider East Renfrewshire community.

A number of objectors to the proposal stated that although this site was inappropriate they were supportive of a site being found to meet the needs of the Muslim community.

Objections

It is acknowledged that the proposed use would add to the pressure on the local road network and could result in congestion around the school with users of the school and new facility accessing the sites at similar times. Therefore a transport assessment would be required to consider the likely strategic impacts of this proposal. In addition to that, a Transport Assessment would be required to fully evaluate the detailed impact of the facility in terms of access points, number of visitors, generated trips, car parking provision, and servicing and sustainable travel modes. There is no current proposal for a shared access and such details will be considered if a planning application is submitted for consideration.

It is likely that there would be increased noise resulting from traffic and the facility itself for nearby residential properties and this would need to be addressed at planning application stage. In addition noise from construction could impact upon the school teaching environment. These issues could be controlled and mitigated through the planning process and a future development brief.

The Council retains the view that the site is located within an area already established for community use, i.e. the new High School which also provides community use in the evenings. A religious/community use at this location would in principle be in keeping with the surrounding uses. However, the design of any development would be a key

consideration and if necessary segregation of any new facility and the school may be required.

Representations objected to the loss of green and recreational space and potential for outdoor learning areas. In addition it was stated that the woodland walkway to the rear of the school building and the bug and bird boxes would be impacted upon.

The site previously had school buildings and a car park located upon it. The school buildings have moved to the south-east closer to Capelrig House and the area of land left is being grassed and landscaped. There was no proposal on the planning application plans for outdoor recreation and learning area. However, the Council acknowledges that development would result in the loss of some green space that could be used by the pupils as informal recreation or for sports training. This is an important consideration in terms of the health agenda that runs throughout the Plan. New improved sports facilities and pitches have been provided as part of the new school development.

The Council would not want to see any development impact upon the woodland walkway area. This is a vital recreational and environmental resource providing wildlife and bio-diversity value and also an important educational function. Protection of ecology/wildlife/bats would require to be addressed in detail at planning application stage.

The Council recognises that development would limit the potential for future school expansion. Although, the new Eastwood High School was constructed to accommodate additional pupils and is not at full capacity, future expansion opportunities are a key consideration.

It was stated that the proposal would not benefit the whole community; however, the representation clearly states that the new facility would be open to the wider community.

A number of representations stated that alternative sites were better suited such as the original proposal for a site at the Malletsheugh/Maidenhill master plan area or at Patterton Farm. A representation was received from GVA Grimley on behalf of Patterton SPV Ltd (in administration) and KPMG regarding the potential to provide a site for a Muslim facility at Patterton Farm. However, this was related to the release of the wider site for mixed use development, including a significant number of residential units. Further to this submission an additional statement was received indicating that the proposal could not currently be delivered but development of the site for a mixed use scheme including provision of a religious/community facility remained a future option. As demonstrated under Issue 9.2.5 this site and the wider proposal are not supported for development.

The retention of the footpath to serve the railway station is important to allow safe and timely access for pupils. Any development would have to accommodate the footpath staying in this location or provide an equivalent safe route that would not increase pedestrian journey times.

The proposals indicated a variety of other potential uses. The Council is not in favour of any additional uses as detailed in the representation being provided on site. It is viewed that the site could not accommodate any additional facilities over and above the religious/community building and car park. This point was agreed by the submission by ERMEC to the Modified Plan.

The Council is aware of the sensitivity of the site and a planning brief would be required

to control future development.

It is recognised there is a need for a Muslim facility within the Newton Mearns area. However, it is considered that the loss of green space, environmental impact, increased noise and traffic issues and loss of expansion options are key considerations that remain to be addressed. On balance based upon these considerations the Council does not see merit in pursuing this site further and the proposal should be deleted from the Plan. The site should be retained as a green space resource under Policy D5: Protection of Urban Greenspace.

Additionally if the Reporter is so minded the Council would be supportive of the alternative site originally promoted in the Proposed Plan at the Malletsheugh/Maidenhil master plan area to be pursued further with the Muslim community and options for a religious/community site be retained in the Development Framework (CD/21). The identification of a suitable site for a Muslim community facility remains a key aspiration of the Council and the need for such a facility was supported by the wider community during the consultation process.

If the Reporter considers that D13.29 is not an appropriate site for a religious/community facility the Council would be supportive of its removal from the Modified Plan and Schedule 7. If the designation is removed the land should be identified under Policy D5.

Reporter's conclusions:

Policy D13: Community, leisure and educational facilities

1. I accept that the term "viable" may be misleading if interpreted strictly in terms of facilities such as theatres which may not be independently economically viable but still operate successfully using external grants and subsidies. It would be unnecessarily detailed to add a definition of the term "viable" to the policy, but this could be added to the glossary of the proposed plan.
2. I am not persuaded that the East Renfrewshire Sports Facility and Pitch Strategy needs to be referred to directly in the policy. This is one of many background documents which would inform the implementation of this policy and reference to all of them would be unnecessary and unduly detailed.
3. With regard to educational facilities, Policies M2.1, M2.2 and M3 on the Strategic Development Opportunity sites state that master plans will be prepared for each site and adopted as supplementary guidance. The policies then list some of the main infrastructure requirements which the master plans will be expected to address including community, leisure and educational facilities. In addition, the council's supplementary planning guidance on development contributions together with Strategic Policy 3 require that all new developments which individually or cumulatively generate a need for new infrastructure or services will be expected to deliver or contribute towards their provision.
4. The education department of the council has been fully involved in the preparation of the proposed plan and will be involved in its implementation. I have been provided with insufficient evidence to challenge the assessment of school provision by the education department and I am satisfied that the implementation of the above policies, master plans and the council's Action Programme will ensure that the necessary educational facilities are provided. I acknowledge the concerns expressed about the insufficiency of current

school place provision and I agree that this should be taken into account when assessing the needs of future growth. However, it cannot be used as a reason to limit or prevent future growth if these needs are going to be addressed. No modification to the proposed plan is required.

5. See under Policy D13.29 below for my response with regard to representation 755/1.

Policy D13.14 Rouken Glen, Giffnock

6. I accept that Schedule 7 should be amended to clarify the location of Rouken Glen. This can be corrected as a minor error without formal modification.

Policy D13.23 Broomburn Drive, Newton Mearns

7. This extensive area of urban greenspace is located in the south-east of Newton Mearns and runs from the existing shops on Mearns Road south along Broomburn Drive. It is identified in the proposed plan as part of the green network and the majority is shown as a Local Biodiversity Site. There is a children's play area to the west of the site along Broomburn Drive and playing fields to the south close to Mearns Castle High School. Public footpaths cross the site.

8. In the council's Green Space Strategy 2008-2012, the majority of the site is audited as being of average quality, with areas to the south of better than average and worse than average quality. The proportion of greenspace availability against greenspace need is in the middle of the higher and lower need categories. The area is identified as a priority greenspace for access, community, biodiversity and attractiveness. The allocation of part of this urban greenspace for a new health centre/nursery school is included in the adopted East Renfrewshire Local Plan 2011 and a planning brief for the site has been prepared by the council.

9. The council's planning brief states that the proposed site for the facilities would be bound by Broomburn Drive to the west, the existing car-park to the north and the Broom Burn to the east. The indicative southern boundary would follow the existing field hedgerow which should be retained. The existing footpath should also remain and landscaping should be an integral part of any design. The medical centre (500 square metre footprint) is shown to the east of the footpath with car-parking and an area of landscaping to the west. Access would be from the existing car-park. The play area and playing fields would not be impacted by the proposed development. The brief refers to the need for improved health care facilities in this area and the support of the Area Committee and most of the local residents for the proposal.

10. I acknowledge the concerns expressed about building on part of this area of parkland. Despite this, I am satisfied that, subject to the implementation of the guidance in the planning brief, the proposed development is likely to have only a modest impact on the overall integrity and value of the remaining, larger, area of open space. The character or function of the green network would not be destroyed and there would be no significant adverse impact on the landscape character and amenity of the site and the surrounding area. There would be no loss of public access and any impact on nature conservation could be mitigated through enhanced provision either as part of the proposed development or elsewhere in the vicinity.

11. On balance, I am satisfied that the community benefits of the proposal would outweigh the loss of what is a relatively small part of this area of urban greenspace. Furthermore, the facility would be located in a sustainable location adjacent to a neighbourhood centre and in the heart of the community which it would serve. I have not been provided with any evidence to substantiate the claim that the new health centre could not be supported and note the lack of objection from the Community Health Care Partnership and Health Board.

12. Finally, I am aware that the planning brief does not currently refer to a nursery school on the site; this was added to the acceptable uses following the last examination. However, the council intends to update the planning brief and I consider that if a nursery school could be accommodated within the development site currently identified (Maps 1 and 2); its use would be compatible with a health centre and would not alter my conclusions above. Taking all of the above into account, I conclude that the site should remain allocated for a new health centre/ nursery school.

13. With regard to flooding issues, I note that the east of the site is included in the Scottish Environment Protection Agency's flood risk maps as being liable to flooding with 0.5 percent annual (1 in 200 year) or greater probability. Although the council's planning brief already refers to the need for a flood risk assessment, in order to be consistent with other sites, I agree that the need for a flood risk assessment should also be included in the proposed plan.

Policy D13.3 Barrhead Town Centre

14. The construction of the Asda supermarket has now been completed and it was open for business at the time of my site visit. I, therefore, appreciate that matters have moved on since the representation was submitted and acknowledge the council's assertion that consultation sessions were arranged as part of the development management process. I understand that Barrhead Community Council was formally consulted on the planning application and gave support. I also visited the sheltered housing and Salvation Army building as part of my site inspections and noted that they had their own entrance and parking provision. The adjacent development would not appear to have had an unacceptable impact on either of these buildings. I am satisfied that the proposed plan does not require modification.

Policy D13.7: Barrhead to Pollok

15. The Lavern Walkway route follows the Lavern Water from just south of Crossmill Business Park, Barrhead to Pollok. I acknowledge that the route is included in the Scottish Environment Protection Agency's flood risk maps as being liable to flooding with 0.5 percent annual (1 in 200 year) or greater probability. Given the level of flood risk identified and the proximity of the Lavern Water to the new walkway, I agree with the Scottish Environment Protection Agency that the need for a flood risk assessment should be clearly shown in the proposed plan. This will ensure that flood risk issues are taken into account at an early stage, before a planning application for development is submitted.

Policy D13.8 Centenary Park/ Carlibar Park, Barrhead

16. A substantial part of both of these existing greenspaces is included in the Scottish Environment Protection Agency's flood risk maps as being liable to flooding with 0.5

percent annual (1 in 200 year) or greater probability. I have no detail of the improvements to the green spaces which are proposed. Given the level of flood risk identified and the proximity of the Levern Water, I agree with the Scottish Environment Protection Agency that the need for a flood risk assessment should be clearly shown in the proposed plan. This will ensure that flood risk issues are taken into account at an early stage, before a planning application for development is submitted.

New site for school – Waterfoot Road, Newton Mearns

17. See under Policy D13.28 – South Waterfoot Road, Newton Mearns below for my response to representation 703/13.

Modification Stage

Policy D13.4 – Barrhead High School (Technical Modification)

18. I note that planning permission for the erection of a replacement high school with associated parking, accesses and landscaping and the formation of a synthetic playing field and running track with the erection of six 15 metre high floodlights was granted on 2 April 2014. While acknowledging the concerns expressed about the proposed development and its impact on Cowan Park, the proposal to develop the site in the proposed plan has now been superceded by this planning consent. I, therefore, agree that the boundary of the planning approval should be indicated more clearly in the proposed plan.

19. The entire site should be identified as D13.4 – Replacement school and associated green space enhancement, on the proposals map. However, I consider that the areas to the east (synthetic playing field and running track) and west (public park) of the replacement high school and associated parking should also be designated as urban greenspace and part of the green network. This will reflect the existing designation of the area to the east and the council's intention, according to the planning brief for the site, that the remainder of the former school site should be developed as a public park to mitigate the loss of part of Cowan Park.

20. With regard to flooding issues, this will have been taken into account as part of the development management process. The need for a requirement for a flood risk assessment has been superceded by the planning consent.

21. Subject to the above, I find that the technical pre-examination modification proposed at Barrhead High School is appropriate.

Policy D13.28 – South Waterfoot Road, Newton Mearns

22. The landowner promoted this site during the consultation on the proposed plan, as an alternative to providing a required denominational primary school in the Malletsheugh/Maidenhill master plan area (Policy M2.1). The landowner has stated that it can be made available at an early date. The council supports this alternative site and its development for a denominational primary school was proposed as a pre-examination modification.

23. This relatively flat, green field site is located in the green belt, to the south of Waterfoot Road on the south-eastern edge of Newton Mearns. Mearns Castle High

School and the urban area of Newton Mearns lie to the north with playing fields to the north-east and open countryside to the south and south-west. The site is partially in agricultural use with the remainder overgrown by grass and scrub. Hedges cross the site. A small area of the eastern corner of the site is identified in the proposed plan as urban greenspace and the rest of the site as part of the green network. No nature conservation designations cover the site. There are 2 archaeological sites to the south of the site boundary. The south-western corner of the site falls within the 300 metre trigger buffer for a possible settlement feature. The council's Green Belt Landscape Character Assessment ranks the green belt value of this area as moderate to strong and the visual sensitivity of the landscape character area as medium to high.

24. I note the arguments advanced by the education department that there is an urgent need for denominational primary school places in the area and that this site could be delivered in a much quicker timescale than the original master plan site, which does not have infrastructure in place. (The council has confirmed that it has allocated £9.5 million towards funding the school in its Capital Plan). While I am aware of the other representations to the contrary, I also acknowledge that the education department considers this site to be more central to the current established demand than the original site and that it would provide a logical split of the school catchment areas and school sites.

25. Furthermore, I accept that a new defensible green belt boundary could be provided as a requirement of the proposed development, in line with criterion 8 of Strategic Policy 2 – Assessment of development proposals. I consider that a strong boundary to stop further loss to development is particularly important in this area of green belt, given its contribution towards preventing the coalescence of Newton Mearns and Waterfoot. I appreciate from my site visit the visual prominence of the site, but I am satisfied that the extent of adverse visual and landscape impacts could be adequately mitigated through sensitive design and landscaping including the provision of a strong green belt boundary and landscaped edge. In addition, the site development could include the retention of a link with the area of green network that exists to the north of Waterfoot Road to prevent fragmentation of the network (again in line with criterion 8 of Strategic Policy 2). The green network boundary could be modified to buffer the revised urban boundary and ensure that there is no overall loss to the total area. As a result, I am satisfied that the impact on the character and function of the green network would be acceptable and that any adverse impacts could be the subject of mitigation.

26. The location of a new school opposite an existing school would inevitably increase the pressure on local roads and could have implications for student safety. I also recognise that this site is not centrally located but on the edge of the built-up area and that there are other new developments proposed in the area. However, the council's road service is generally supportive of the proposal, subject to detailed design considerations being addressed and designed to the appropriate standards. There are no obvious problems with the provision of access to the site and I accept that detailed transport design considerations, including road safety issues such as crossing the road and access to public transport/improved pedestrian links, could be dealt with following the preparation of a transport assessment and development brief for the site. I am satisfied that other concerns expressed with regard to archaeology, construction noise and any nature conservation issues could also be addressed in a development brief for the site and through the development management process. I note that the council's action programme states that a development brief for the site will be prepared as a priority. Matters with regard to the detailed operation of the school are outside my remit to

consider and would be dealt with by the education department

27. To conclude, non-conforming uses should only be considered favourably in the green belt in exceptional or mitigating circumstances. Although both the urgency and the need for denominational school places is contended and the availability of alternative sites outwith the green belt and within the centre of the community referred to, I have insufficient evidence to counter the views of the education department or to show that any of the alternative sites could be developed in a similarly short timescale. On balance, I find that the immediate need for the provision of primary school places and the community benefits which would result, outweigh the loss of this area of green belt, urban greenspace and the green network subject to the requirement for a sufficiently robust and defensible green belt boundary. The provision of a clearly identifiable and robust green belt boundary which accords with Strategic Policy 2 and paragraph 51 of Scottish Planning Policy would be an essential component of any new school development. Without this the loss of green belt land would be unacceptable.

28. I have taken into account all of the representations objecting to this proposal but, for the reasons given above, I find that the pre-examination modification for the provision of a new denominational primary school at south Waterfoot Road, Newton Mearns is acceptable and that the proposed plan should be modified to include this allocation.

Policy D13.29 – Capelrig Road, Newton Mearns

29. This site was put forward during the consultation on the proposed plan as a location for the provision of an East Renfrewshire Mosque and Community Centre facility. It was suggested as an alternative to the potential sites in the Malletsheugh/Maidenhill and Barrhead South master plan areas (Policies M2.1 or M2.2) originally promoted in the proposed plan. The council owns the proposed site and supported its allocation as a religious/community facility as a pre-examination modification. However, following the results of public consultation on the proposed modification, the council considers that the loss of green space, environmental impact, increased noise and traffic issues and loss of expansion options are key considerations that remain to be addressed. On balance, based upon these considerations the council no longer sees merit in pursuing the site further and proposes that the original potential sites in the master plan areas should instead be retained.

30. The site is located on the northern edge of Newton Mearns. It is within the grounds and to the north of the newly built Eastwood High School. The land slopes steeply upwards from the school and is currently grassed with a band of mature trees along the northern, western and eastern boundaries. Some younger trees have recently been planted in the grassed area and public footpaths/steps to the school and railway station run across and along the edge of the site. It is identified partly as urban greenspace in the proposed plan. No nature conservation designations cover the site but it is within a Tree Preservation Order area.

31. I accept that there is a proven need for a mosque and community centre facility within East Renfrewshire and that there would be a significant community benefit from its provision. I also appreciate that Section 149 of the Equality Act 2010 – the public sector equality duty – requires public authorities to have regard to the need to take steps to meet the needs of persons who share a relevant protected characteristic (for example religion or belief) that are different from the needs of persons who do not share it and to foster good relations between persons who share a relevant protected characteristic and

persons who do not share it. However, for the reasons given below, I am not convinced that the location of a religious/community facility on this particular site would be appropriate.

32. Following my further information request, the education department has commented that the provision of such a facility next to the high school would limit any potential future expansion of the school estate such as the inclusion of pre-five facilities or the opportunity to develop a full 3-18 campus. I have considered this loss of expansion options within the context of the significant level of future housing growth planned for the area and Newton Mearns in particular. The potential currently exists to accommodate a proportion of any future need for school places by expansion onto this part of the existing school site. While a religious/community use could, in principle, sit comfortably beside another community use such as a school, the opportunity for expansion onto this residual site to create an enlarged school campus would be lost if it was developed as a religious/community centre.

33. In addition, a religious/community use would generate additional traffic movements on a site which is not only adjacent to an existing high school but also opposite Crookfur primary school and nursery. Some representations state that the majority of religious activities would be outwith school hours. However, the most recent representation on behalf of the East Renfrewshire Mosque and Community Centre (ERMEC) refers to a full-time day care nursery being part of the envisaged facility. Despite the presence of nearby bus stops, I share the concerns of the council's road's service that without further detail with regard to the size, scale and use profile of the proposed religious/community facility, it is difficult to anticipate the cumulative impacts on the surrounding road network and the possible implications for the safety of both children and drivers. I also acknowledge, from my site visit, the potential problems identified by the roads service in achieving visibility splays for a new separate access onto Capelrig Road due to the geometry of the existing carriageway and the road incline. (The council's road's service does not consider it practical to use the existing school service road as a dual access). There is insufficient evidence to demonstrate that traffic issues could be satisfactorily addressed on this site.

34. In any case, I note that the original representation to the proposed plan suggesting the Capelrig site, also supported one of the original sites (in the Malletsheugh/Maidenhill master plan area) if there were unforeseen or unresolvable issues with its delivery. Furthermore, I am aware that temporary planning permission for a period of 3 years was granted on appeal in 2013 for the change of use from a former social club in Langrig Road, Newton Mearns, to a Muslim community facility, including as a place for religious activities. I recognise the need expressed for a new dedicated mosque, but a further application for the continuation of this use could be submitted to the planning authority, to attempt to secure its retention as a temporary solution pending the establishment of a more permanent facility as part of the master plan area or elsewhere.

35. The Malletsheugh/Maidenhill master plan area and the former social club are still within/adjacent to Newton Mearns but to the south of the built-up area. I do not regard either of these sites as "remote" to the Muslim community given their relatively short distance from the proposed Capelrig site, which is regarded as centrally located and accessible, and their access to the A77 and M77. In addition, public transport upgrades will be required as part of the development of the master plan area allowing access by more sustainable modes of transport. Although it is now argued that the Malletsheugh/Maidenhill master plan site would be "practically undeliverable", I have not

been provided with any detail to substantiate why that would be the case. I am satisfied that alternative solutions for the provision of a religious/community facility do exist both within the short and longer term.

36. To conclude, I have taken into account the significant number of representations both supporting and objecting to this proposed modification. I appreciate that the facility would be open to the wider community, its location would be relatively isolated from residential properties, it is not in a flood risk area and that many of the concerns with regard to the detailed layout, design and construction could be addressed through a planning brief for the site and at the detailed planning application stage. However, while I have had regard to the public sector equality duty, I consider that there are other more suitable sites for a religious/community facility and that there is a short term solution available while those other options are explored. The council has confirmed its intention to pursue other options. I find that this particular site is unsuitable for the reasons set out above. The loss of urban greenspace would not be justified and I do not consider that the proposed plan should be modified to include this site as a religious/community facility.

37. Although unfortunately, this site would not be appropriate to meet the needs expressed, I would expect the council to continue to enter into dialogue with the Muslim community to ensure that a solution is achieved both in the short and longer-term. In the meantime, the identification of a potential site for a religious/community facility in the Malletsheugh/Maidenhill master plan area should be retained.

38. See also Issue 9.2.5 with regard to Patterson Farm, where it is recommended that the land should remain as part of the green belt and not be allocated for a mixed use development to include 250 houses and a religious/community facility.

Reporter's recommendations:

I recommend that the following modifications be made:

1. Add the following description of the term "viable" to the glossary – "Able to operate or exist successfully. This may include the use of external funding such as grants and subsidies".

2. Amend the description for D13.4 – Barrhead High School in Schedule 7 to read "Replacement school and associated greenspace enhancement" and show the area coloured yellow in the pre-examination modification to the proposals map, as Site D13.4. Also identify as urban greenspace and part of the green network, the following parts of the site which are outside the boundary of the replacement high school and associated parking:

- to the east, the synthetic playing field and running track and
- to the west, the public park.

3. Remove site D13.28 from the green belt, urban greenspace and green network and allocate in Schedule 7 for "The provision of a new denominational primary school, subject to the requirement for a robust and defensible green belt boundary". Alter the green network boundary to follow the revised urban boundary and amend the proposals map as appropriate.

4. In Schedule 7 D13.23 after "Broomburn Drive, Newton Mearns" insert "**".

5. In Schedule 7 D13.7 after “Barrhead to Pollok” insert “*”.
6. In Schedule 7 D13.8 after “Centenary Park/Carlibar Park, Barrhead” insert “*”.
7. At the foot of Schedule 7 insert “* Development proposals will require to be subject to a flood risk assessment.”

Issue 8	GENERAL DEVELOPMENT MANAGEMENT POLICIES	
Development plan reference:	Policy D14: Extensions to Existing Buildings and Erection of Outbuildings and Garages Policy D15: Sub-division of the Curtilage of a Dwellinghouse for a New Dwellinghouse and Replacement of an Existing House with a New House Policy D17: Telecommunications Policy D18: Airport Safeguarding	Reporter: Dilwyn Thomas
Body or person(s) submitting a representation raising the issue (including reference number):		
Mobile Operators Association (Ref 213/1) Nazir Ahmed (Ref 755/21) (Ref 755/22) (Ref 755/23) (Ref 755/24)		
Provision of the development plan to which the issue relates:	General Development Management policies.	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy D14: Extensions to Existing Buildings and Erection of Outbuildings and Garages</u></p> <p><u>Support</u></p> <p><u>Nazir Ahmed (Ref 755/21)</u> - Support policy</p> <p><u>(b) Policy D15: Sub-division of the Curtilage of a Dwellinghouse for a New Dwellinghouse and Replacement of an Existing House with a New House</u></p> <p><u>Support</u></p> <p><u>Nazir Ahmed (Ref 755/22)</u> - Support policy</p> <p><u>(c) Policy D17: Telecommunications</u></p> <p><u>Support</u></p> <p><u>Mobile Operators Association (Ref 213/1)</u> - While we support the inclusion of Policy D17 on Telecommunications within the emerging Local Development Plan the representee states a number of modifications to the policy</p> <p><u>Nazir Ahmed (Ref 755/23)</u> - Support policy</p> <p><u>(d) Policy D18: Airport Safeguarding</u></p> <p><u>Support</u></p> <p><u>Nazir Ahmed (Ref 755/24)</u> - Support policy</p>		

Modifications sought by those submitting representations:**(c) Policy D17: Telecommunications****Mobile Operators Association (Ref 213/1)**

The wording of paragraph 5.27.2 should be amended to relate only to new telecommunications sites as some of the requirements would not be relevant to the upgrade of an existing telecommunications site.

If the Council intends to proceed with Policy D17 in its current format then amend wording to the start of paragraph 5.27.2:

“For new telecommunications sites, Telecoms operators should...”

However, if it would be considered useful in creating a concise and flexible telecommunications policy, suggest the following wording:

Proposals for telecommunications development will be permitted provided that the following criteria are met: -

(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;

(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;

(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.

(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.

When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.

Summary of responses (including reasons) by planning authority:**(a) Policy D14: Extensions to Existing Buildings and Erection of Outbuildings and Garages****Support****Nazir Ahmed (Ref 755/21)**

The Council acknowledges and welcomes the support for Policy D14.

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

(b) Policy D15: Sub-division of the Curtilage of a Dwellinghouse for a New Dwellinghouse and Replacement of an Existing House with a New House**Support****Nazir Ahmed (Ref 755/22)**

The Council acknowledges and welcomes the support for Policy D15.

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

(c) Policy D17: Telecommunications**Support****Mobile Operators Association (Ref 213/1), Nazir Ahmed (Ref 755/23)**

The Council acknowledges and welcomes the support for Policy D17.

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

Mobile Operators Association (Ref 213/1)

It is appreciated that para 5.27.2 will largely apply to new telecommunication sites, nevertheless, the Council does receive applications for upgrades of existing telecoms sites where changes in height, position of masts or other material changes does require full consideration and therefore the additional information is required.

The Council considers that the Policy as written provides a fair balance between control and flexibility and is in line with the requirements of SPP. The points suggested are all considered as part of the development management process and are not considered necessary within the Plan.

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

(d) Policy D18: Airport Safeguarding**Nazir Ahmed (Ref 755/24)****Support**

The Council acknowledges and welcomes the support for Policy D18.

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

Reporter's conclusions:

1. Policy D17 in the proposed plan states:

"5.27 Policy D17: Telecommunications

5.27.1. Development will be acceptable where:

- The developer can demonstrate that all discounted alternatives, including sharing of existing installations, have been fully investigated;
- A solution has been proposed in order to minimise any possible visual or physical impact on the surrounding built and natural environment;
- The development does not prejudice traffic safety or pedestrian safety.

5.27.2. In addition, telecoms operators should provide a written statement that indicates how they arrived at the selected application site. They will be required to provide written evidence that demonstrates proof of search for alternative sites and why these alternatives have been discounted. They should explain the alternative design solutions

that have been considered for the application site.

5.27.3. Applications should be accompanied by a declaration that the equipment and installation is designed to be in full compliance with the appropriate International Commission on Non-Ionizing Radiation Protection guidelines.”

2. An adjustment is sought to the policy that would ensure that paragraph 5.27.2 applied only to new telecommunications sites, and not upgrades of existing sites. Additionally, it is suggested that the policy could be made more concise and flexible by replacing it with 4 criteria, which would relate to minimising the visual impact of new sites, minimising the impact on the external appearance of a host building, requiring an exploration of the use of existing buildings or sites only in the case of new masts, and ensuring that development does not have an adverse effect on sensitive areas. Furthermore, the policy should require the planning authority to have regard to the operational requirements of networks and the limitations of the technology. The planning authority proposes no change to the plan.

3. Both the 2010 Scottish Planning Policy and Scottish Planning Policy (2014) set out 5 options to be considered when selecting communications sites and designing base stations. They also set out 7 matters to be addressed in planning applications. I do not consider that the alternative policy suggested in the representation would better reflect the requirements of national guidance or that it would significantly improve the policy in the proposed plan. Both policies deal with visual impact, and the reference to sensitive areas in the criteria in the alternative policy is unnecessary because the impact of any telecommunication development on them would be covered by the reference in Policy D12 to minimising the physical impact on the natural environment, and by other policies in the plan.

4. I believe that the proposed policy and supporting text properly reflect the emphasis in national guidance on developing world class digital connectivity and strengthening networks while siting and designing infrastructure to minimise environmental impacts. It is unnecessary to refer in the policy to taking into account the operational requirements of networks and technological limitations in the manner proposed in the representation. However, the policy could helpfully more fully reflect the less obvious requirements that national guidance indicates proposals should address. This could be achieved by referring to the use of the smallest suitable equipment, commensurate with technological requirements, in a new bullet point in paragraph 5.27.1, and by requiring the cumulative effects of a proposal in combination with existing equipment in the area, and how it fits into the wider network, to be dealt with in the written statement referred to in paragraph 5.27.2.

5. I am satisfied that the planning authority has reasonably concluded that paragraph 5.27.2 should not be restricted to new telecommunication sites as the upgrading of a site may involve changes which make it necessary to justify its selection as the preferred location. However, there may be occasions when a justification is not required. To allow for this, the first sentence of paragraph 5.27.2 should be adjusted to include the words where applicable.

6. Overall, adjustments are required to the proposed plan as set out below.

Reporter's recommendations:

I recommend that the following modification be made:

1. Adjust Policy D17 to read (*changes in italics*):

“5.27 Policy D17: Telecommunications

5.27.1. Development will be acceptable where:

- The developer can demonstrate that all discounted alternatives, including sharing of existing installations, have been fully investigated;
- *The developer can demonstrate that the smallest suitable equipment, commensurate with technological requirements, is being installed;*
- A solution has been proposed in order to minimise any possible visual or physical impact on the surrounding built and natural environment;
- The development does not prejudice traffic safety or pedestrian safety.

5.27.2. In addition, *where applicable*, telecoms operators should provide a written statement that indicates how they arrived at the selected application site. They will be required to provide written evidence that demonstrates proof of search for alternative sites and why these alternatives have been discounted. They should explain the alternative design solutions that have been considered for the application site, *address the cumulative effects of the proposal in combination with existing equipment in the area, and explain how the proposed equipment fits into the wider network.*

5.27.3 Applications ...”

Issue 9.1	HOUSING SUPPLY DELIVERY AND DISTRIBUTION	
Development plan reference:	Policy SG1: Housing Supply Policy SG3: Phasing of New Housing Development	Reporter: Katrina Rice
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>James Whyteside (Ref 82/1) (Ref 82/2) Robert Johnston (Ref 131/3) Wallace Land (Ref 255/5) Norman Graham (Ref 286/5) Wallace Land Investment and Management (Ref 331/2) (Ref 331/7) Roger Spooner (Ref 387/3) CALA Homes (West) and Paterson Partners (Ref 414/3) John Hall (Ref 486/10) Thornliebank Community Council (Ref 504/4) Lynda Murray (Ref 511/4) Keith A Vallance (Ref 536/6) (Ref 536/7)</p>	<p>Alistair Fyfe (Ref 541/3) Neil Warren (Ref 578/3) Aileen M Fyfe (Ref 599/3) James Sandeman (Ref 600/9) Newton Mearns Community Council (Ref 686/5) Persimmon Homes Ltd (Ref 743/9) Nazir Ahmed (Ref 755/25) (Ref 755/26) Homes for Scotland (Ref 758/2) Greenlaw Park Limited (Ref 775/4) Iain McCowan (Ref 896/6) Lynch Homes (Ref 965/6)</p> <p><u>Appendix 1 – Standard Letter</u> Standard Letter Comment SG1B (17 reps) (Ref 1005/1)</p>	
Provision of the development plan to which the issue relates:	Chapter 6: Meeting Housing Needs Para 6.2 – 6.2.7 Housing Supply Delivery and Distribution Policy SG2.3: Neilston Road, Neilston LDP21: Newfield Place, Thornliebank	
Planning authority's summary of the representation(s):		
<p><u>(A) POLICY SG1: HOUSING SUPPLY</u></p> <p><u>Support</u></p> <p><u>Nazir Ahmed (Ref 755/25)</u> - Support policy</p> <p><u>Objections</u></p> <p><u>James Whyteside (Ref 82/2) (Ref 82/11)</u> (Ref 82/2) No explanation given as to what ERC agreed its contribution and decision that ER must provide 5700 homes</p> <p>(Ref 82/11) If Council can reduce maximum provision set in SDP why can this not be reduced further?</p> <p><u>Robert Johnston (Ref 131/3)</u> Lack of clarity between tables in LDP and MIR between land supply, land requirements and housing needs Yearly timescales would be useful More cross referencing between MIR and LDP</p>		

Norman Graham (Ref 286/5)

Provides 700 private homes above SDP
 2000 affordable homes blow SDP target
 19 additions to the land supply, 17 of which in Green Belt
 SDP housing requirement aspirational beyond 2018
 25% greater supplied than aspirational requirement
 Have not demonstrated how infrastructure can be supplied

Wallace Land Investment and Management (Ref 331/7)

The Council has still to prove the effectiveness of all of the sites proposed for allocation as required by PAN 2/2010. Liaison with the private sector and Homes for Scotland will enable the Council to further confirm effectiveness of sites through the Housing Land Audit process.

Roger Spooner (Ref 387/3)

Housing is not required other kinds of employment, care, education, leisure and outdoor access more useful
 Many sites proposed on valuable land in mature areas
 Selling off pockets of valuable land as a short term budgetary measure cannot improve the community long term

John Hall (Ref 486/10)

It is clear that additional Affordable Housing should be located where there is most need, not where developers will make the most profit.

There are apparently almost 3,000 house plots with planning permission available within East Renfrewshire that are not yet built.

If housing supply is an issue, the Council needs to press for progress on existing sites with planning consent, rather than seek further sites for development.

It is believed there is adequate land supply currently available to meet the initial 5-year requirement.

If further land supply is needed for the longer term and if this needs to be taken from the Green

Belt (which needs to be demonstrated) there are other less sensitive and less contentious Greenfield sites which could be utilised.

The requirement to make up a perceived shortfall in the supply of Affordable Housing should

apply over the whole of East Renfrewshire and not be particularised re artificial sub-areas in the

Council area.

There is no perceived need or demand for Affordable Housing in this locality.

Ritchie Adam, Thornliebank Community Council (Ref 504/4) - LDP21 (Newfield Place Thornliebank) Object to consideration of rezoning this site, unacceptable loss of few green spaces left (Site Evaluation)

Lynda Murray (Ref 511/4)

Council has not demonstrated associated infrastructure can be delivered

No costed data to analyse and comment on

No allowance for secondary school places

Advised of shortfall in projected funds for the proposed primary schools

Keith A Vallance (Ref 536/6) (Ref 536/7)

(Ref 536/6) Based solely on arbitrary assessment of potential population growth and household size - do not stand up to scrutiny or other evidence

Monitoring Statement figures require significantly more robust base information

Population increase figures based on those in monitoring statement would mean there is provision for household sizes of 1.43 where average is 2.47 dropping to 2.25 by 2035.

Based on this the amount of houses required would be 2783 not 4389.

Suggested 2000 home increase from Monitoring Statement table B14

Based on houses already constructed and consented schemes there is sufficient

Brownfield sites for remainder

(Ref 536/7) Based on housing timeframe which commenced in 2008, between 2008 and 2012 597 houses were completed, plus windfall, sites with consent and Greenlaw, without further release of land there is provision of 1887 units within Eastwood alone.

Demonstrating that further release of Green Belt is unjustified.

Alistair Fyfe (Ref 541/3)

No rationale for demand proposed

Almost all housing on Greenfield land and much of this Green Belt - should be greater emphasis on Brownfield use in whole region

Road maintenance

Will increase travel to work and congestion - should be located closer to transport hubs

Neil Warren (Ref 578/3)

Private houses in excess of SDP, more than 25%

SDP target is aspirational beyond 2018

Not demonstrated how infrastructure can be delivered

Aileen M Fyfe (Ref 599/3)

No rationale for demand proposed

Almost all housing on Greenfield land and much of this Green Belt - should be greater emphasis on Brownfield use in whole region

Road maintenance

Will increase travel to work and congestion - should be located closer to transport hubs

Newton Mearns Community Council (Ref 686/5)

LDP proposes 700 houses over SDP

SDP figures aspirational

LDP allocates 25% more

Infrastructure delivery not demonstrated – shortfall in education funding.

Persimmon Homes Ltd (Ref 743/9)

Focus on masterplanned areas has not provided a range and choice of sites for development as required by SPP

Shortfall in effective land supply - 1190 units due to previous period shortfall and masterplans only deliver 328 units between 2012-2017 causing an additional shortfall of 338 units, therefore, shortfall in total 1528 units

1354 units in HLS will not be delivered due to issues such as ownership and ground condition

Have just reduced affordable housing target as opposed to attempting to meet it.

Homes for Scotland (Ref 758/2)

Support that plan recognises need for growth, shortage of housing land and generous supply etc.

Commend plan's Monitoring Statement and analysis but do not fully agree with conclusions

Agree delivery of 3200 affordable homes to 2025 not possible

Argue that plan should allocate land to meet full SDP allocation

Short-term issues should not be a consideration (recession etc) and it is more sensible to plan for full need and demand

Assessment of delivery of affordable housing does not acknowledge possibility of changes in resource or delivery methods

Further increasing private sector housing could enable more affordable housing

Potential underestimate of private demand in ER from SDP, shortage of supply will lead to reduced affordability

Post 2025 phasing relies on areas of sites also allocated in earlier phases but subject to requirements such as infrastructure, flexibility by identifying a greater number of sites required

Should allow for additional consents if 5 year land supply not maintained as part of the policy

Greenlaw Park Limited (Ref 775/4)

Not generous land supply as required by SPP

Fails to allocate sufficient effective sites

Does not provide 5 year land supply

Does not meet SDP requirements

SDOs make up most of land supply, M2.1 cannot be delivered short term

Iain McCowan (Ref 896/6)

Private sector housing in excess of SDP, 25% over aspirational target

SDP housing target is aspirational beyond 2018

Sites should be held back based on population/migration figures, so as to ensure supply is not over generous

Not demonstrated how associated infrastructure can be delivered

Standard Letter Comment SG1B (17 reps) (Ref 1005/1) - Object to SDP target.

(B) POLICY SG3: PHASING OF NEW HOUSING DEVELOPMENT**Support**

Nazir Ahmed (Ref 755/26) - Support policy

Objection

Wallace Land (Ref 255/5) - No need for the council to impose phasing restrictions.

Wallace Land Investment and Management (Ref 331/2)

There is no requirement in SPP or in the SDP for the Council to impose phasing restrictions in the LDP

There is therefore no need to restrict development over particular time periods - This could impact on the funding for infrastructure.

CALA Homes (West) and Paterson Partners (Ref 414/3)

There is no requirement in SPP or SDP to impose phasing
 Council have not proven effectiveness of all sites for allocation cannot pre-empt with certainty that sites will be released
 Site LDP40B is effectively demonstrated by evidence supplied
 Market and growth should not be restricted by phasing

James Sandeman (Ref 600/9) - "phased release" is meaningless unless the developer actually builds. Can the Council ensure that he does, by placing a sunset clause on the planning consent?

Lynch Homes (Ref 965/6)

No requirement in SPP to impose phasing
 Effectiveness not proven so cannot be certain they will be released for development

Modifications sought by those submitting representations:**(A) POLICY SG1: HOUSING SUPPLY**

James Whyteside (Ref 82/2) (Ref 82/11), Roger Spooner (Ref 387/3), John Hall (Ref 486/10), Norman Graham (Ref 286/5), Lynda Murray (Ref 511/4), Keith A Vallance (Ref 536/6) (Ref 536/7), Alistair Fyfe (Ref 541/3), Neil Warren (Ref 578/3), Aileen M Fyfe (Ref 599/3), Newton Mearns Community Council (Ref 686/5), Iain McCowan (Ref 896/6), Standard Letter Comment SG1B (17 reps) (Ref 1005/1)

A number of similar modifications were suggested:

- Strategy should focus on Brownfield sites only.
- Housing targets should be reduced further.
- Plan requires to demonstrate how associated infrastructure can be delivered – schools and road improvements.
- No need for affordable housing.
- Minimise new house building in mature neighbourhoods.

Robert Johnston (Ref 131/3) - More cross referencing between MIR and LDP

Thornliebank Community Council (Ref 504/4) - Reallocate land as Urban Green space.

Wallace Land Investment and Management (Ref 331/7) - Plan requires to demonstrate effectiveness of allocated sites.

Persimmon Homes Ltd (Ref 743/9)

Full housing requirement of SDP should be allocated in LDP.
 Additional 1528 units should also be allocated for 2012-2017 to provide an effective land supply.
 Enable a higher level of market housing to address limitations of delivery of affordable housing and scope for developers to propose innovative ways of providing affordable
 Add to para 6.3.2 "Planning consents may be granted for unallocated sites where the established land supply is not maintaining a minimum 5 year land supply."

Homes for Scotland (Ref 758/2)

Allocate full supply from SDP, 5700, as all tenure
 Affordable housing limitations should be enabled through greater private sector allocation

Add "Planning consents may be granted for unallocated sites where the established land supply is not maintaining a minimum 5 year effective supply"

Greenlaw Park Limited (Ref 775/4)

Full housing requirement of SDP should be allocated in LDP.
Additional sites require to be allocated – 2ha site at Greenlaw.

(B) POLICY SG3: PHASING OF NEW HOUSING DEVELOPMENT

Wallace Land (Ref 255/5), Wallace Land Investment and Management (Ref 331/2), CALA Homes (West) and Paterson Partners (Ref 414/3), Lynch Homes (Ref 965/6)

Delete phasing restrictions from the LDP.

James Sandeman (Ref 600/9) - Representation seeks clarity on the implementation of the Policy and phasing attached to planning applications.

Summary of responses (including reasons) by planning authority:

(A) POLICY SG1: Housing Supply

Support

Nazir Ahmed (Ref 755/25)

The Council acknowledges and welcomes the support for Policy SG1.

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

Objections

James Whyteside (Ref 82/2) (Ref 82/11), Robert Johnston (Ref 131/3), Norman Graham (Ref 286/5), Wallace Land Investment and Management (Ref 331/7), Roger Spooner (Ref 387/3), John Hall (Ref 486/10), Lynda Murray (Ref 511/4), Keith A Vallance (Ref 536/6, 536/7), Alistair Fyfe (Ref 541/3), Neil Warren (Ref 578/3), Aileen M Fyfe (Ref 599/3), Newton Mearns Community Council (Ref 686/5), Persimmon Homes Ltd (Ref 743/9), Homes for Scotland (Ref 758/2), Greenlaw Park Limited (Ref 775/4), Iain McCowan (Ref 896/6), Standard Letter Comment SG1B (17 reps) (Ref 1005/1)

Scottish Planning Policy (SPP) (CD/69) states that it is the role of LDPs to deliver the scale of house completions required across all tenures. LDPs are required to ensure that a 5 year effective housing land supply is maintained at all times (Para 75) throughout the plan period and to allocate land on a range of sites which is effective up to year 10 from the predicted year of adoption ensuring a continuous generous supply at all times (Para 72).

The Housing Requirement for East Renfrewshire is set out in Schedule 11A of the Approved Strategic Development Plan (SDP) (CD/81) and is a combination of the private sector requirement (2500) and the affordable housing requirement including backlog need (3200). As demonstrated under Issue 2.1.2 this figure is calculated from the Strategic Housing Need and Demand Assessment (SHNDA) (CD/82) which informed the SDP. Strategy Support Measure 10 'Housing Development and Local Flexibility' of the SDP is also important, as it allows LDPs to identify private sector sites where they could address housing needs in the affordable sector provided that such proposals do not compromise

the fundamental strategy of the SDP or LDP. A detailed assessment of the SDP Housing Requirements and the current housing land supply was undertaken to identify a realistic and achievable housing land supply target for the Proposed Plan. It was viewed that a lower target would not meet the requirements of SPP and SDP.

The justification and explanation of how the housing supply target of 4100 units was calculated is set out in Appendix H1 of the Monitoring Statement (CD/08). This involved an assessment of the Indicative Housing Requirements of the SDP against the 9 key criteria (Appendix H1 Para 1.8.8 to 1.8.52 and as summarised in Table H1.7) and other local criteria including the environmental capacity of the Green Belt to accommodate development. The next stage was an assessment of the current land supply (Para 1.8.53 to 1.8.78) and of Brownfield and vacant sites. Completions from 2009 onwards were also factored into the calculations. This process concluded that there was insufficient capacity from these sources and therefore additional sites would be required. The SEA process, Site Evaluation (CD/09) and Green Belt review were central to the identification of sites. As stated under the response to the Plans Strategy a number of Green Belt sites were released to meet housing targets. The Green Belt review process is documented under Issue 2.1.2.

The MIR (CD/03) and comments received have been used in preparing the Proposed Plan, Para 1.5.15 – 1.5.24 Appendix H1 of the Monitoring Statement outlines the MIR housing approach. Para 1.3 of the Plan also refers to the role of the MIR.

A number of representations stated that there was no need to release sites in the Green Belt as there were sufficient existing sites available to meet the SDP requirements. However, as clearly shown above additional sites were required to meet housing targets.

A contrary argument was received from the development industry arguing the case that there is insufficient land for housing provided and that additional land allocations require to be considered. Responses to each site proposed for inclusion in the Plan is documented under Issue 3.2, Issue 3.10 and Issues 9.2.1 – 9.2.7. It was also stated that relying on Brown field sites and large master planned sites would not provide required levels of growth in the short term and that the programming of the master plan sites was ambitious and not realistic. However, as demonstrated under Issues 3.3 - 3.5 the Council has prepared detailed Development Frameworks for each of the master plan areas which demonstrate clearly the delivery and effectiveness of each site. In addition it is viewed that not all Brownfield sites are more problematic than Greenfield and can also be delivered in the early part of the Plan period. Brownfield and Green field sites are programmed across both Phases of the Plan.

The Council maintains that this Plan makes adequate provision for housing including affordable housing through the provision of a generous supply of land for housing and no additional releases are required. To provide further flexibility and generosity to the supply land is safeguarded for longer term development post 2025. No allowance has been made for windfall and small sites which may come forward in the Proposed Plan period which will add to the supply once gaining consent. This would effectively add further flexibility and generosity to the supply.

The Monitoring Statement Appendix H1 clearly demonstrates in Table H1.26 that a continuous 5 year land supply is met and that an effective supply up-to year 10 from the date of Adoption is provided (Table H1.27) in compliance with SPP. In addition a generous housing land supply is clearly provided with the Plan providing a private sector

housing target 28% greater than the SDP requirements. Key housing tables (CD/55) have been updated to reflect the 2013 HLA (CD/54) and factoring in sites included in the Proposed Plan, which again supports the Council's position. The effectiveness of sites in the HLA has been agreed with Homes for Scotland, subject to a number of minor disputes. The HLA also clearly sets out yearly programming for each housing site.

A number of representations state a failure of the Council to deliver the required infrastructure and services to support previous developments and query how this will be delivered to accommodate new proposed developments. These matters have been demonstrated under Issues 2.1.2 and Issue 2.3. Issue 3.3 addresses infrastructure issues for the Maidenhill master plan including funding for schools. It is viewed that the Action Programme (CD/07) and the SPG on Development Contributions (2012) (CD/25) will be key in clarifying the development requirements for each site. No significant issues have been raised by any of the infrastructure and service providers.

The representation from Holder Planning (775/4) seeking the allocation of a site at Greenlaw is addressed under Issue 9.2.5.

Persimmon Homes and Homes for Scotland requested additional wording to Para 6.3.2 to allow granting of further sites if the 5 year land supply is not met. Strategic Policy 2: Assessment of Development Proposals provides a suitable policy framework for considering new proposals on sites not allocated in the Plan. Policy SG3: Phasing of New Housing Development provides the mechanism to bring forward sites allocated for later Plan phases. It is viewed that Strategic Policy 1: Development Strategy when read alongside Strategic Policy 2 and Policy SG3 adequately covers the concerns raised. Further information on phasing is outlined below.

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

LDP21 Newfield Place, Thornliebank

Thornliebank Community Council (Ref 504/4) - The Community Council objected to the rezoning of this site. However, the site is retained as Protected Urban Greenspace under Policy D5 and not as a housing proposal within the Plan.

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

(B) POLICY SG3: PHASING OF NEW HOUSING DEVELOPMENT

Support

Nazir Ahmed (Ref 755/26)

The Council acknowledges and welcomes the support for Policy SG3.

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

Objections

Wallace Land (Ref 255/5), Wallace Land Investment and Management (Ref 331/2), CALA Homes (West) and Paterson Partners (Ref 414/3), James Sandeman (Ref 600/9), Lynch Homes (Ref 965/6)

In order to ensure that development takes place in accordance with the Plan's strategy, it

is necessary to phase the provision of the housing and master plan sites. This phasing will ensure that there will be a continuity of supply, ensure that a 5-year effective land supply is maintained at all times, ensure that any infrastructure requirements or upgrades are delivered and allow for monitoring and review. To achieve this, Policy SG3: Phasing of New Housing Development sets out a phasing mechanism which will be used to govern the timing of release of sites. The Plan period has been divided into two phasing periods:

- Phase 1: 2012-25; and
- Phase 2: post 2025 (Safeguarded sites).

The monitoring of the release of sites for development will be assisted by the phasing of such releases. In the event of any shortfalls in delivery sites identified for Phase 2 can be brought forward through this policy mechanism.

This approach is supported by SPP at Para 15 which states that “Development Plans should be clear about the scale of anticipated change and demonstrate the underlying reasons for the preferred location and the likely sequence of development”. Furthermore, at Para 71 of SPP it is stated that “Consideration of the scale and location of the housing land requirement in development plans well ahead of land being required for development should assist in aligning the investment decisions of developers, infrastructure providers and others” In addition Para 75 states that “Development plans should identify triggers for the release of future phases of effective sites, such as where the housing land audit or development plan action programme indicates that a 5 year effective land supply is not being maintained”.

The Council maintains that Policy SG3 and the plans strategy are therefore in accordance with these principles and that a phasing policy remains a key component of the Plan. Policy SG3 identifies triggers to ensure a 5 year land supply is consistently provided. It is viewed that the strategic long term vision and the phasing of sites will assist with providing long term certainty for service providers and the development industry and will not restrict delivery of sites.

In addition Strategic Policy 2: Assessment of Development proposals provides the framework for considering alternative proposals for sites not allocated in the Plan.

The Council recognises though that it has limited powers to ensure the developer builds out a site once consent has been granted. However, the Council can impose a condition requiring the development to commence within a shorter time frame if deemed appropriate. This option will continue to be investigated.

Issues 3.3-3.5 and the 2013 HLA demonstrate the effectiveness and deliverability of the master plan areas as further evidenced in their individual Development Frameworks. In addition representations received to the Proposed Plan confirm a very strong interest in supporting these sites and a desire to proceed with development at an early date.

Notwithstanding the above it the Council sees merit in providing flexibility with the delivery of the master plans and would be supportive of inserting the word ‘minimum’ for Phase 1 sites in Schedule 11. Detailed phasing Plans will be prepared for the SPG documents for each master plan.

If the Reporter is so minded to recommend that the Plan is modified, as set out below, the Council would be supportive of this modification because it would provide further flexibility

with delivery of the master plan sites and would not have any implications for the LDP Strategy or other policies within the LDP.

Schedule 11 should be amended to read (additional text in italics):

Schedule 11: Distribution, Capacity and Phasing of Additions to the Housing land Supply – Master Planned Sites

Site Ref	Location	HMA	Type	Notional Capacity #	Minimum Phase 1 Delivery by 2025 (Allocated land/Sites)		Phase 2 Delivery Post 2025 (safeguarded land/sites)	Notes
					2012-20	2020-25		

If the Reporter is in agreement with the above modification Policies M2.1 (Para 4.5.4) and M2.2 (Para 4.6.4) should also be modified to include reference to minimum numbers.

Wallace Land (Ref 255/5)

The Council agrees with the representation regarding the phasing of this particular site(SG2.3 Neilston Road Neilston) and sees merit in allocating the site as a Phase 1 development opportunity. It was considered that development of the site could be restricted by phasing it over Phase 1 and 2 and early delivery of the site could assist with delivering regeneration objectives for Neilston and increasing the effective land supply. This site is discussed further under Issue 3.10.

It is worth reiterating that the Council retains the view that phasing of the larger master plan sites over both plan phases remains an appropriate approach, although additional flexibility over delivery is sought as referred to above.

If the Reporter is so minded to recommend that the Representation from GL Hearn is accepted and the Plan modified, as set out below, the Council would be supportive of this modification because it would not have any implications for the LDP Strategy or other policies within the LDP.

Schedule 10 should be amended to read (additional text in italics):

Schedule 10: Distribution, Capacity and Phasing of Additions to the Housing land Supply

Site Ref	Location	HMA	Type	Notional Capacity #	Minimum Phase 1 Delivery by 2025 (Allocated land/Sites)		Phase 2 Delivery Post 2025 (safeguarded land/sites)	Notes
					2012-20	2020-25		
SG2.3	Neilston Road, Neilston	<i>LV</i>	<i>GF</i>	<i>150</i>	<i>100</i>	<i>50</i>	<i>0</i>	

CALA Homes (West) and Paterson Partners (Ref 414/3)

The response to site LDP40B is set out under Issue 9.2.4.

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

Reporter's conclusions:Background

1. Scottish Planning Policy clearly states that the planning system should identify a “generous” supply of land for each housing market area (paragraph 110). 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. They should provide for a minimum of 5 years effective land supply at all times (paragraph 119). The Glasgow and the Clyde Valley Strategic Development Plan identifies the East Renfrewshire housing requirement for both the private and affordable sectors based upon the findings of the Strategic Housing Need and Demand Assessment (2011). Paragraph 113 of Scottish Planning Policy states that where the Scottish Government is satisfied that the housing need and demand assessment is robust and credible, the approach used will not normally be considered further at a development plan examination. The process for the Glasgow and Clyde Valley Housing Market Partnership Housing Need and Demand Assessment (2011) has been certified as robust and credible by the Scottish Government's Centre for Housing Market Analysis.

2. I note that the strategic development plan has adopted a demographic scenario founded on higher migration into the city-region and projects a level of household growth greater than that projected by the Scottish Government's National Records of Scotland. It is based on an optimistic recovery of the wider region's economy and a quicker return to past growth rates. The all-tenure requirement for East Renfrewshire identified in the Strategic Development Plan is 5,700 (5,200 from 2008/9 to 2020 and 500 from 2020 to 2025). This comprises a requirement of 2,500 private sector homes (2,200 from 2008/9 to 2020 and 300 from 2020 to 2025) and 3,200 affordable homes (3,000 from 2008/9 to 2020 and 200 from 2020 to 2025). I have no remit to alter the figures in the strategic development plan but would draw attention to the fact that the highest level of private (35,400) and affordable (56,000) house building is directed to Glasgow City. Glasgow City accounts for 49.6 percent of the total all-tenure requirement for the Glasgow and Clyde Valley area as a whole. East Renfrewshire accounts for 3 percent.

Housing supply

3. In order to satisfy the strategic requirement, the council proposes a potential housing supply of 3,259 private sector homes and 1,020 affordable homes (see paragraph 16 below for an explanation of the amended figures). Although the supply of private sector housing is considerably in excess of the strategic development plan requirement, the reduced number of affordable homes proposed results in an all-tenure figure of 4,279 which is below the 5,700 requirement. An additional 1,683 units are also programmed post 2025 and safeguarded for longer term development. No allowance has been made for windfall and small sites.

4. I accept that there is no requirement in the strategic development plan for large scale strategic land releases in East Renfrewshire to meet private market housing requirements

over and above the existing identified supply. However, I also note that without additional land releases, according to the figures in the council's monitoring statement, there would be an increasing shortfall in delivery against the strategic development plan private sector requirement by 2020 with on-going delivery issues in the early part of the plan period. Although there would be an adequate land supply by 2025, this is dependent on there being no further slippages in programming. The figures illustrate that a 5 year effective land supply would not be achieved until the period 2016-2021 with a significant deficit recorded from 2012 to 2016. Delivery in the early part of the plan period would be a major issue as both the supply and the build rate would be below requirements. Furthermore, affordable housing delivery and supply would remain significantly below the strategic development plan requirements (45 per year, a total of 725 for the period 2009-2025).

5. I find that a continuation of the current adopted local plan strategy relying on existing sites and permissions with no additional housing development opportunities, other than windfall and small sites, would not address on-going delivery issues, affordable housing deficits or provide a level of generosity or flexibility in housing supply. This approach would not satisfy the requirements of Scottish Planning Policy or the strategic development plan.

6. I acknowledge that paragraph 4.86 of the strategic development plan states that the private sector and affordable housing requirements should be treated as indicative and that each planning authority should justify any variation from them. Paragraph 4.86a lists 9 criteria against which any such variations could be demonstrated by further analysis. The council has carried out such an assessment against these and 3 additional criteria - environmental capacity to accommodate development, population projections and recent trends in housing completions. The analysis concluded that the indicative affordable housing requirements (3,200 units), which include backlog need, were unlikely to be met in full due to the following factors:

- The scale of the backlog and the rate at which it can be met.
- The significant need for additional affordable housing.
- The reductions in public sector subsidy for the delivery of affordable housing.
- The capacity of private developers to deliver various forms of affordable housing.
- The extent to which affordable housing needs can be met without building new houses.

7. I regard the council's analysis as thorough and agree with its conclusions that it is unlikely that affordable housing requirements, including backlog need, could be met in full in the proposed plan and that it is more realistic to set a reduced target. In any case, the strategic development plan states that the affordable housing need does not directly translate into a new house building requirement for affordable housing. Local authorities should take into account other forms of housing provision including conversion, subdivision, and the use of empty properties, and other policy interventions such as adaptations and the management of lettings (paragraph 4.80). The council has stated that alternative solutions for affordable housing delivery without the need for public subsidy and non-new build options will continue to be investigated to increase the affordable supply. I am satisfied that the council's approach in providing for less than the strategic development plan figure for affordable housing is both appropriate and realistic (see also Issue 10 on affordable housing and housing mix).

8. I am aware of the concerns expressed with regard to the council's proposal to provide for 3,259 private sector dwellings, which is 30 percent above the strategic requirement. I

also note the contrary arguments that the level of private sector house building should be increased to meet the full 5,700 all-tenure requirement. Following my further information request it is also contended that the all-tenure requirement (or the housing supply target of 4100) should be increased further, by a margin of 10 to 20 percent, to reflect paragraph 116 of Scottish Planning Policy.

9. The over-provision of private sector housing will assist in the delivery of affordable housing through a minimum 25 percent affordable housing contribution on all private sector residential developments of 4 or more dwellings. It is calculated that this will increase the number of affordable homes provided over the plan period from 725 to 1020. The higher private sector provision will also assist in the delivery of the required number of housing completions overall and provide flexibility and generosity to the supply in line with Scottish Planning Policy. I accept that the current economic climate is having an impact on the delivery of housing but this may change and the likelihood is that economic circumstances will improve over the life-time of the plan.

10. It is argued that that a higher level of private housing provision would satisfy the strategic development plan's all-tenure requirement in full, allow for greater flexibility in delivery and provide further affordable housing. The effectiveness of housing sites, particularly brownfield sites and the master plan areas is contested and alternative sites suggested. An over-reliance on one house builder to deliver housing sites is referred to. However, I recognise that the council has undertaken an extensive level of evidence gathering in deciding which sites to include in the proposed plan including Strategic Environmental Assessment, a site evaluation methodology (based on the principles of sustainable development), rural settlement analysis and green belt review. I have found under Issue 2.1.2 that the development strategy which is based on a controlled master planned urban expansion approach is appropriate. The master plan areas and other key housing allocations are found to be effective and deliverable elsewhere in this report. I also note that Homes for Scotland has agreed both the 2012 and 2013 Housing Land Audits, which set out the yearly programming for each housing site, subject to only a small number of disputed sites (in the 2013 Housing Land Audit, 38 units of the effective land supply).

11. In addition, no allowance has been made by the council for potential additional contributions to the potential housing supply from windfall or small sites and Policy SG3 on the phasing of new housing development will allow housing safeguarded for release beyond 2025, to be released within the plan period if necessary to maintain a 5 year supply. The council is already proposing a potential private housing supply which is 30 percent above the strategic requirement. I consider that this will adequately ensure that a generous supply of land for private housing is provided in accordance with Scottish Planning Policy.

12. I have assessed the calculations included in the council's monitoring statement and the alternative methods of calculation suggested by representees. Following clarification through my further information requests, I am satisfied that the level of private house building proposed will ensure that a 5 year effective supply is maintained throughout the plan period. The range and choice of sites proposed as effective up to year 10 from the predicted year of adoption will ensure a continuous generous supply at all times. Despite the representations to the contrary, I do not consider that there is an over reliance on brownfield sites, one single house builder or on the master plan areas and I have insufficient evidence to substantiate the claims that the council programming is over-ambitious or unrealistic. I consider that the potential private sector housing supply

identified provides sufficient flexibility and generosity. Furthermore, for the reasons given above, I consider that a reduced target for the provision of affordable housing is appropriate and realistic. No sites have been suggested for affordable housing alone and I find that given the level of over-provision already proposed, the need for additional affordable housing would not justify a further increase in the private sector housing figures.

13. The council's approach to housing supply takes a long-term view beyond the plan period. The new allocations of land for housing development are subject to phased release beyond 2025 in order to ensure that a 5 year continuous effective land supply is maintained at all times. Policy SG3 states that the phase 2 safeguarded locations may be released if necessary to maintain a 5 year land supply. Policy SG1 – Housing supply describes how the land supply will be monitored annually through the housing land audit, housing trajectory and action programme and that a 5 year continuous effective land supply will be maintained at all times. Furthermore, planning applications for housing on unallocated sites can be considered under Strategic Policy 2 – Assessment of development proposals. I consider that the issue of unallocated sites and the maintenance of a 5 year effective land supply is already adequately covered in the proposed plan and a further reference in paragraph 6.3.2 is unnecessary.

14. I recognise that 63 percent of the potential housing supply will take place on greenfield sites but I am also aware that approximately 94 percent of the vacant and derelict sites within East Renfrewshire are currently allocated for housing or business and industrial use in the local plan or have an existing planning consent. I regard the level of development on green field land to be a necessary consequence of the lack of alternative brownfield sites available; the adoption of strategic development opportunities and a master planned approach; and the need for unconstrained sites which can be developed quickly, early in the plan period, to achieve a 5 year supply.

15. The addition of a new housing site at SG2.20 Grahamston Road/Blackbyres Road, Barrhead (35 dwellings- Issue 3.5) and the deletion of one housing site at SG1.5 Fereneze, Barrhead (40 dwellings – Issue 9.1.1) have been recommended elsewhere in this report. The number of dwellings on site SG1.34 Capelrig Road (Hillcrest), Newton Mearns has been changed from 5 to 11 and on site SG1.23 Robslee Drive, Giffnock from 100 to 60 in Issues 9.1.4 and 9.1.3 respectively. This results in a decrease in the overall private sector potential housing supply figure of 39. Given the over-provision in the level of private sector housing described above, I do not consider that the identification of alternative site/s to make up this relatively small adjustment to the overall figure is justified.

16. I note from my further information requests that the proposed local development plan potential housing supply figures in Table 4 – Housing requirements and targets 2008/09-2025 need to be amended from 3,241 to 3259 (private) and from 1038 to 1020 (affordable). This is due to a minor error in the formula used by the council. I have produced an amended version of Table 4 in my recommendations below to take into account both this minor error and the additions/deletions to the potential housing supply figures referred to above.

17. Overall, I find that the council's approach to both private sector and affordable housing supply, is appropriate and in accordance with both Scottish Planning Policy and the strategic development plan. I have taken into account the responses to my further information requests as well as the original representations submitted in coming to this

view.

18. I agree that, as suggested by the council in their response to my further information request (FIR 05), showing the total programming of each allocated housing site over phase 1 and phase 2 in the same format as Schedules 10 and 11, would add clarity to the plan.

19. I do not consider that further references to the Main Issues Report are required.

Phasing

20. Scottish Planning Policy states that planning authorities should “actively manage” the housing land supply using the preparation of the annual housing land audit as a tool to critically review and monitor the availability of effective housing land, the progress of sites through the planning process and housing completions (paragraph 123). The development plan action programme should be used alongside the housing land audit to help planning authorities manage the land supply (paragraph 124). Action programmes should be actively used to drive the delivery of planned developments; to align stakeholders, “phasing”, financing and infrastructure investment over the long term (paragraph 31).

21. One of the key tools in managing the long term housing land supply will be the council’s phasing policy, which safeguards certain land/sites for delivery beyond the plan period post 2025 (phase 2). This phasing will ensure that land comes forward in a planned way; there is a continuity of supply; that any infrastructure requirements or upgrades are delivered; and allow for monitoring and review. It will help to provide long term certainty for both service providers and the development industry in general.

22. I do not agree with the arguments advanced that it will restrict the delivery of sites unnecessarily. Policy SG3 – Phasing of new housing development will allow for the early release of phase 2 sites if there is a shortfall in the maintenance of a 5 year land supply or where the levels of affordable housing significantly in advance of the 25 percent requirements are being promoted. As a consequence, effective sites from later phases will be able to come forward to replace sites in earlier phases, should these earlier sites prove to be ineffective or if unforeseen issues arise to restrict delivery. Given the generous potential private housing supply included in the proposed plan at present, I do not accept that further flexibility by including reference to “minimum” delivery numbers for the master planned sites is either necessary or appropriate. The support of the council for the modification does not alter my view that sufficient flexibility, where required, for the delivery of a 5 year land supply already exists. Furthermore, I have insufficient evidence to substantiate the claims that the phasing of sites would impact on the funding for infrastructure.

23. While recognising that the council cannot force developers to build-out particular sites once they have planning permission, I appreciate the council’s commitment to working with owners/developers in bringing sites forward for development and note the intention to investigate the imposition of a condition requiring development to commence within a shorter time frame, if deemed appropriate.

24. I consider that the phasing of sites is a critical element in the plan’s approach and in achieving the council’s vision for the area, up to 2025 and beyond. I am satisfied that in adopting a phasing policy the council is, in line with paragraph 30 of Scottish Planning

Policy, adopting a long term approach which positively seeks opportunities to meet the development needs of the plan area in a way which is flexible enough to adapt to changing circumstances over time.

Infrastructure

25. A detailed infrastructure requirement schedule will be completed for each master planned area and development briefs will be prepared for smaller sites. Master plans and development briefs will be prepared as supplementary guidance and will include an assessment of flood risk to accord with Policies E4 – Flood risk and E5 - Surface water drainage and water quality. I consider that the requirements of Strategic Policy 3, the supplementary planning guidance on development contributions, the action programme and master planning will ensure that the requirement for new infrastructure such as schools, public transport, roads and greenspace are provided as an integral part of the development process. I note that none of the main service providers have made fundamental objections regarding the infrastructure requirements as insufficient or incapable of implementation. I am aware of the criticism of those who claim failure to provide adequate infrastructure and services to support previous developments. However, I have insufficient evidence to show that there is or would be a shortfall in funding. Overall, I am satisfied that development contributions are capable of achieving the necessary level of provision.

26. It is not proposed to re-zone Site LDP21- Newfield Place, Thornliebank in the proposed plan as a housing site. The site is designated as urban greenspace under Policy D5 – Protection of urban greenspace. No modification to the proposed plan is required.

27. The representation with regard to the phasing of site SG2.3 is dealt with under Issue 3.10.

28. The representation with regard to site LDP40B is dealt with under Issue 9.2.4.

29. The allocation of a site at Greenlaw is dealt with under Issue 9.2.5.

Reporter’s recommendations:

I recommend that the following modifications be made:

1. Amend “Table 4: Housing requirements and targets 2008/09-2025” as follows:

	Strategic Development Plan Requirements	Housing Supply Target	Local Development Plan Potential Housing Supply
Private	2500	3200	3220
Affordable	3200	900	1020
Total	5700	4100	4240

2. Amend Schedules 8 and 9 to reflect the format of Schedules 10 and 11, as suggested in the council’s response to Further Information Request 05.

Issue 9.1.1	HOUSING SUPPLY - BARRHEAD	
Development plan reference:	Policy SG1: Housing Supply	Reporter: Katrina Rice
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Ian Davidson (Ref 9/5) Dr Stuart Honan (Ref 29/1) Thomas Mann (Ref 36/1) Edith Megson (Ref 47/1) Rozanne Brakenridge (Ref 58/1) SEPA (Ref 70/3) (Ref 70/15) (Ref 70/16) (Ref 70/17) (Ref 70/18) Westmarch Barrhead LLP (Ref 73/1) Keiller Edinburgh Lts and Aberdeen Estate Company Ltd (Ref 476/1)</p> <p><u>Appendix 1 – Standard Letter</u> (d) Policy SG1.5 Fereneze, Barrhead - Common Objections List of Representees (47reps) Standard Letter Comment SG1.5A (4 reps) (Ref 1003/1)</p>		
Provision of the development plan to which the issue relates:	Policy SG1.1 Barnes Street/Cogan Street/Robertson Street, Barrhead Policy SG1.2 Chappell field, Barrhead Policy SG1.4 Dunterlie Park/Carlibar Road, Barrhead Policy SG1.6 Glen Street/Carlibar Road, Barrhead Policy SG1.5 Fereneze, Barrhead Policy SG1.7 Glen Street/Walton Street, Barrhead Policy SG1.8 Kelburn Street/Neilston Road, Barrhead	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy SG1.1 Barnes Street/Cogan Street/Robertson Street, Barrhead</u></p> <p><u>Objection</u></p> <p><u>SEPA (Ref 70/15)</u> - Assessment of flood risk required.</p> <p><u>(b) Policy SG1.2 Chappell field, Barrhead</u></p> <p><u>Support</u></p> <p><u>Westmarch Barrhead LLP (Ref 73/1)</u> Continued support for allocation of this site for housing and its potential to assist in the regeneration of Barrhead Westmarch are presently in discussion with two national housebuilders with a view to developing the site, site therefore remains to have potential and is currently attracting market interest Comments on greenspace, wildlife, access and affect on existing properties: greenspace loss is minimal, proposed site is predominantly brownfield site heavily overgrown, derelict and subject to fly tipping, development will enhance site</p>		

proposed development does not propose significant development within greenspace or local biodiversity area
 only small part of site affected by potential flooding
 SINC largely concentrated to west areas of site and has been subject to an Ecological Assessment and tree survey
 proposed development designed to minimise impact and intrusion on SINC
 proposals would not compromise the ecological value of the area
 proposals include provision for landscape enhancement and management plan

Objection

Dr Stuart Honan (Ref 29/1)

Object to site as:

Will impact on residential amenity of his and neighbouring properties. For reasons of: loss of privacy, loss of view, out of character with the existing state of development, loss of open aspect.

The above shall impact on quality of life and economic value of property.

Thomas Mann (Ref 36/1)

Comments on Chappellfield planning brief April 2011

120 units plus affordable hard to achieve on this site

limited access to site, questionable if permeability possible

improvements to surrounding roads/junctions hard to achieve

various private roads surround the site and should remain undisturbed

bridge and access from Cogan Street must be in place, and conditioned so, before work starts

full contamination survey of all site required

Archaeological sites

design constraints to railway line, should remain as unbuilt recreation areas

Zone E SINC, trees and plant life 50%

septic tanks and outfalls should remain viable or connected to new system as part of development

Zone E intrusion into protected nature area

Edith Megson (Ref 47/1)

Loss of amenity/view from property

Site currently home to large range of wildlife including protected species

if building goes ahead, should be restricted to area on left of Chappell Street and not area next to railway line to protect residential amenity of Maxton Grove

Tree planting near railway to provide screening.

Rozanne Brakenridge (Ref 58/1)

Loss of amenity/views

Loss of character

Effect on wildlife

Area of Tree Preservation Order

Reduction in house values

Roads/bridge could not cope with increased traffic

SEPA (Ref 70/16) - Assessment of flood risk required.

(c) Policy SG1.4 Dunterlie Park/ Carlibar Road, Barrhead**Objection****SEPA (Ref 70/3)**

Objection in principle on flood risk grounds.

Policy SG1.6 Glen Street/Carlibar Road, Barrhead**Objection****SEPA (Ref 70/17)**

Assessment of flood risk required.

(d) Policy SG1.5 Fereneze, Barrhead

(Full list of representees set out in Appendix 1 and objections set out in Appendix 2 with summarised key points set out below.

Summary of Common Objections

- Objection to development of land designated as Green Belt
- Disagree with reporter's conclusions during the examination of the Local Plan.
- There is sufficient and more suitable previously developed land in Barrhead - Old Nestle site, Volvo and Shanks developed first.
- No need for open-market housing in this area. Barrhead has more than 5 years supply of housing land.
- Support houses on Shanks Industrial Site if assured homes were affordable to local people.
- Non alignment with LDP policies: Strategic Aim - no benefit to community and loss of rich and diverse environment. SP1, SP2, D1, D3, D4 , D8
- Adverse effect on residential amenity including (amongst other factors) noise, disturbance, overlooking, loss of privacy and overshadowing.
- Area is designated as important for nature conservation and could impinge on SSSI and biodiversity.
- The country park is next door to site and wildlife is often encountered here.
- Development would be highly visible - strong contribution to the containment of Barrhead.
- Destroy open aspect of neighbourhood.
- Proposed development is overbearing, out of scale or out of character.
- Will result in loss of existing views.
- Site used by locals and tourists for recreation – walking, horse riding, for children.
- Development will adversely affect highway safety and convenience of road users in area.
- Roads poor during winter.
- Development of the site would require blasting - personal danger and damage to property – insurance issues.
- Severe flooding and drainage problems in area.
- Utilities cannot take extra housing
- Cross Arthurlie School is already at capacity. Will have a negative impact on existing families with schools overcrowding and a lack of places.

(e) Policy SG1.7 Glen Street/ Walton Street, Barrhead**Objection**

SEPA (Ref 70/18) - Assessment of flood risk required.

(f) Policy SG1.8 Kelburn Street/Neilston Road, Barrhead**Support****Keiller Edinburgh Lts and Aberdeen Estate Company Ltd (Ref 476/1)**

Support for site with capacity for 108 units
Assists in the regeneration of Barrhead

Objection**Ian Davidson (Ref 9/5)**

Why are road improvements at Lochlobo Road/Volvo site dependent on housing development?
The existing traffic flow requires attention as does traffic via Barrhead Main Street.
Why are public transport improvements dependent on further housing development?

Modifications sought by those submitting representations:**(a) Policy SG1.1 Barnes Street/Cogan Street/Robertson Street, Barrhead**

SEPA (Ref 70/15) - Flood risk assessment required.

(b) Policy SG1.2 Chappellfield, Barrhead

Dr Stuart Honan (Ref 29/1), Edith Megson (Ref 47/1), Rozanne Brakenridge (Ref 58/1) - Representees seeking the protection of the trees and land between Chappell Street and the railway

SEPA (Ref 70/16) - Flood risk assessment required.

(c) Policy SG1.4 Dunterlie Park/Carlibar Road, Barrhead

SEPA (Ref 70/3) - Remove from Plan on flood risk grounds.

(d) Policy SG1.6 Glen Street/Carlibar Road, Barrhead

Julie Gerc, SEPA (Ref 70/17) - Flood risk assessment required.

(e) Policy SG1.5 Fereneze, Barrhead

Nicola and Andrew Crawford (Ref 4/1), M and C Wong (Ref 7/1), Rob Steer (Ref 8/1), Aileen Thomson (Ref 14/1), James Hamilton (Ref 17/1), Eileen and Barry Hughes (Ref 18/1), Ian Higgins (Ref 20/1), Margaret Fulton (Ref 23/1), Kirsty Menzies (Ref 24/1), Thomas McBride (Ref 26/1), Shirley-Anne Kierney (Ref 27/1), Morris McNaughton (Ref 32/1), Joyce McNaughton (Ref 33/1), H M McKenzie (Ref 34/1), Jim Hamilton (Ref 37/1), Elizabeth D McKenzie (Ref 41/1), Robert McKenzie (Ref 42/1),

David Gorman and Mrs J Gorman (Ref 62/1), Mr and Mrs J Thomson (Ref 63/1), John and Rosemary MacLeod (Ref 68/1), Robert and Jennifer McCombe (Ref 71/1), Sheena Graham (Ref 74/1), Graham Fotheringham (Ref 84/1), Robert Macaulay (Ref 101/1), Iain and Lynn Macleod (Ref 133/1), Ann and James Paterson (Ref 141/1), Mr and Mrs G Aird (Ref 205/1), Mrs P Blair (Ref 207/1), Agnes Brown (Ref 218/1), Thomas Lagan (Ref 219/1), Lorna Thomson (Ref 318/1), Gareth Thomson (Ref 319/1), Morag McKenzie (Ref 320/1), Tom Lagan on behalf of 516 Signatories of SG1.5 Petition (Ref 332/1), Mr and Mrs J Dunne (Ref 359/1), Selby and Catherine Cochrane (Ref 391/1), Colin Nicol (Ref 400/1), Alan and Moira Gibb (Ref 540/1), Mr J and Mrs F Auchincloss (Ref 557/1), J Graeme Herd (Ref 626/1), Brian Maclachlan (Ref 687/1), Claire Hendry (Ref 719/1), Colin Hamilton (Ref 766/1), Mr and Mrs Cook (Ref 847/1), Louise Maxwell (Ref 915/1), Ann McMillan (Ref 922/1), Standard Letter Comment SG1.5A (4 reps) (Ref 1003/1)

Delete Site SG1.5 from Plan and reallocate as Green Belt.

Toby Wilson, RSPB Scotland, South and West Region (Ref 280/14) - Redraw boundary to conform with policy D8.

(f) Policy SG1.7 Glen Street/Walton Street, Barrhead

Julie Gerc, SEPA (Ref 70/18) - Flood risk assessment required.

(g) Policy SG1.8 Kelburn Street/Neilston Road, Barrhead

Keiller Edinburgh Lts and Aberdeen Estate Company Ltd (Ref 476/1) - Request LDP highlights that particular site has no obligation to provide affordable housing as per the extant planning permission on the site.

Ian Davidson (Ref 9/5) - Clarification on road improvements associated with this proposal.

Summary of responses (including reasons) by planning authority:

OVERVIEW

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council's approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

(a) Policy SG1.1 Barnes Street/Cogan Street/Robertson Street, Barrhead

Objection

SEPA (Ref 70/15)

In this particular case, it is acknowledged that there may be an issue with respect to flooding. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5:

Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals. The comments of SEPA will be taken fully into account in the decision-making process.

If the Reporter is so minded to recommend that the Representation from SEPA is accepted and the Plan modified to reflect the need for a Flood Risk Assessment, the Council would be supportive of this modification because it would not have any implications for the wider area or other policies within the LDP.

In Schedules 8 and 9

Add F: Flood Risk Assessment Required.

(b) Policy SG1.2 Chappellfield, Barrhead

Support

Westmarch Barrhead LLP (Ref 73/1)

The Council acknowledges and welcomes the support for Policy SG1.2.

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

Objections

Dr Stuart Honan (Ref 29/1), Thomas Mann (Ref 36/1), Edith Megson (Ref 47/1), Rozanne Brakenridge (Ref 58/1), SEPA (Ref 70/16)

A number of representations were received objecting to the inclusion of this site.

This site was considered under the examination into the current Local Plan and retained as a housing site subject to certain caveats regarding flood risk, transport and greenspace as recommended by the Reporter. These caveats form part of the Adopted Local Plan. A Development Brief (CD/38) was prepared and these caveats are key elements of that document.

The Brief sets out the planning requirements for the site including issues of access, design and amenity, permeability, flood risk, affordable housing, identifying the developable areas and protecting and enhancing environmental features. The outcomes for the Brief are set out in Para 1.10 with Objectives set out in Section 2. The design objectives are displayed in Plan E. Any development would have to be carefully designed to ensure environmental issues and issues of amenity for existing houses are respected and addressed. In this particular case, it is acknowledged that there may be an issue with respect to flooding.

A comment (Honan Ref 29/1) indicated that Parcel A, an area of land between the railway and Chappell Street, should be removed. The Brief sets out the design objectives for this sensitive area and recommends its retention.

Value of property (Honan Ref 29/1) is not a planning issue.

Overall it is viewed that the Development brief adequately addresses comments received. The site remains part of the effective and established land supply and will contribute to the regeneration objectives of Barrhead.

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 because it would not have any implications for the wider area or other policies within the LDP.

In Schedules 8 and 9

Add F: Flood Risk Assessment Required.

All other matters are appropriately addressed in the Planning Brief.

(c) Policy SG1.4 Dunterlie Park/Carlibar Road Barrhead & SG1.6 Glen Street/Carlibar Road Barrhead

Objections

SEPA (Ref 70/03, 70/17)

Site SG1.4 and adjacent site SG1.6 form part of the regeneration proposals for Barrhead. The Football club are considering investing in the current ground, but the potential to relocate to an alternative site remains a live option. Both sites are programmed for the longer term as part of the established land supply and should be retained in the Plan and kept under review through the monitoring and review process.

In this particular case, it is acknowledged that there may be an issue with respect to flooding. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals. The comments of SEPA will be taken fully into account in the decision-making process.

If the Reporter is so minded to recommend that the Representations from SEPA are accepted and the Plan modified to reflect the need for a Flood Risk Assessment, the Council would be supportive of this modification because it would not have any implications for the wider area or other policies within the LDP.

In Schedules 8 and 9

Add F: Flood Risk Assessment Required.

(d) Policy SG1.5 Fereneze, Barrhead

Objections

Nicola and Andrew Crawford (Ref 4/1), M and C Wong (Ref 7/1), Rob Steer (Ref 8/1), Aileen Thomson (Ref 14/1), James Hamilton (Ref 17/1), Eileen and Barry Hughes (Ref 18/1), Ian Higgins (Ref 20/1), Margaret Fulton (Ref 23/1), Kirsty Menzies (Ref 24/1), Thomas McBride (Ref 26/1), Shirley-Anne Kierney (Ref 27/1), Morris McNaughton (Ref 32/1), Joyce McNaughton (Ref 33/1), H M McKenzie (Ref 34/1), Jim Hamilton (Ref 37/1), Elizabeth D McKenzie (Ref 41/1), Robert McKenzie (Ref 42/1), David Gorman and Mrs J Gorman (Ref 62/1), Mr and Mrs J Thomson (Ref 63/1), John and Rosemary MacLeod (Ref 68/1), Robert and Jennifer McCombe (Ref 71/1), Sheena Graham (Ref 74/1), Graham Fotheringham (Ref 84/1), Robert Macaulay (Ref 101/1), Iain and Lynn Macleod (Ref 133/1), Ann and James Paterson (Ref 141/1), Mr and Mrs G Aird (Ref 205/1), Mrs P Blair (Ref 207/1), Agnes Brown (Ref 218/1), Thomas Lagan (Ref 219/1), RSPB Scotland, South and West Region (Ref 280/14),

Lorna Thomson (Ref 318/1), Gareth Thomson (Ref 319/1), Morag McKenzie (Ref 320/1), Tom Lagan on behalf of 516 Signatories of SG1.5 Petition (Ref 332/1), Mr and Mrs J Dunne (Ref 359/1), Selby and Catherine Cochrane (Ref 391/1), Colin Nicol (Ref 400/1), Alan and Moira Gibb (Ref 540/1), Mr J and Mrs F Auchincloss (Ref 557/1), J Graeme Herd (Ref 626/1), Brian Maclachlan (Ref 687/1), Claire Hendry (Ref 719/1), Colin Hamilton (Ref 766/1), Mr and Mrs Cook (Ref 847/1), Louise Maxwell (Ref 915/1), Ann McMillan (Ref 922/1), Standard Letter Comment SG1.5A (4 reps) (Ref 1003/1)

A significant volume of objections were received arguing the case for the deletion of the site from the Proposed Plan and its unsuitability for Housing. Concerns regarding access, infrastructure, school capacity, availability of Brownfield sites, loss of amenity, impact upon wildlife and biodiversity, increase in traffic, loss of recreation and landscape and visual impacts were raised. It was viewed the site should be re-designated as Green Belt.

The site was identified as a housing site (Ref H1.6) for approximately 40 units as a result of a recommendation by Reporters appointed by Scottish Government who undertook the Examination of the Plan in 2010 (CD/02). It was the Reporters view that the 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 forms an important role in forming a backdrop to the setting of Barrhead and provides bio-diversity and green network value. The site is a grassed field used for grazing horses.

The site was previously promoted by Mactaggart and Mickel, however, this developer no longer have an interest in the site. There were no representations supporting this site for development during consultation to the Proposed Plan.

On the basis that there is no developer promoting the site for development the Council views the site as non effective. This position has been reflected in the 2013 HLA (CD/54) where the site has been reprogrammed post 2025. The Council agrees that some unresolved issues in relation to access and environmental impact exist. The community are clear they wish the site deleted from the Plan.

The Council is of view that the site should be deleted from the plan and the designation returned to green belt. It is not viewed that the deletion of this site will have any negative impact upon the overall land supply position for Barrhead or across the Council area due to the sites longer term programming. Furthermore, a number of new sites are included for housing within Barrhead, such as the Barrhead South and Shanks master planned areas which will deliver houses in Phase 1 of the Plan. These new sites and the current sites will provide a suitable range and choice in Barrhead to meet local needs and provide an effective generous housing land supply.

Furthermore, if the Reporter is so minded to support some limited enabling development at Site SG6.5 Grahamston Road/Blackbyres Road Barrhead, to assist with delivering employment generating uses on the remainder of the site, as set out under Issue 3.5, this will further increase the effective land supply in Barrhead.

If the Reporter considers that site SG1.5 is not an appropriate housing site the Council considers that its removal from the Plan would not result in a shortfall in the effective land supply. If the designation is removed the land should be identified as Green Belt and excluded from the settlement boundary.

(e) Policy SG1.7 Glenn Street/Walton Street Barrhead

Objections

SEPA (Ref 70/018)

In this particular case, it is acknowledged that there may be an issue with respect to flooding. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals. The comments of SEPA will be taken fully into account in the decision-making process.

If the Reporter is so minded to recommend that the Representation from SEPA is accepted and the Plan modified to reflect the need for a Flood Risk Assessment, the Council would be supportive of this modification because it would not have any implications for the wider area or other policies within the LDP.

In Schedules 8 and 9

Add F: Flood Risk Assessment Required.

(f) Policy SG1.8 Kelburn Street/Neilston Road, Barrhead

Support

Keiller Edinburgh Lts and Aberdeen Estate Company Ltd (Ref 476/1)

The Council acknowledges and welcomes the support for Policy SG1.8. The representee was seeking additional reference in the Plan relating to affordable housing provision. Although the Council recognises that the site benefits from an outline consent that does not require affordable housing provision any future applications may require reassessment. It is therefore viewed that no additional references to affordable housing are required.

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

Objection

Ian Davidson (Ref 9/5)

Outline planning permission for residential development (2005/0961/TP) was previously granted on appeal (P/PPA/220/148). The outline consent was for private housing with no affordable housing provision and included a condition to require the upgrading of the access to form a roundabout. This consent was renewed in October 2010 under planning permission 2010/0343/TP. A further application (2013/0478/TP) (CD/91) for 58 units was approved 27th November 2013. No affordable housing contribution was required due to financial viability justification being submitted. The approval was also conditioned to stipulate that development should commence within 1 year of the date of planning permission rather than 3.

The Council's Roads Service assessed this proposal and concluded that the development

raised no significant road safety or traffic congestion issues. The Roads Service also indicated that the principle of the installation of the traffic signals and road re-alignment was acceptable but must occur early in the development.

The granting of planning consent and resultant transport improvements address matters raised.

Regarding issues of public transport the Council would state that new public transport provision can be delivered through the Planning system by way of Development contributions. Other improvements to the network are outwith the Council's control and are dependent on other organisations such as SPT and their plans, budgets and priorities.

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

Reporter's conclusions:

Policy SG1.1 Barnes Street/Cogan Street/Robertson Street, Barrhead

1. I note that a small area of this proposed housing site is included in the Scottish Environment Protection Agency's flood risk maps as being liable to flooding with 0.5 percent annual (1 in 200 year) or greater probability. Given this and the proximity of the Levern Water, I agree that the need for a flood risk assessment should be added to the proposed plan.

Policy SG1.2 Chappellfield, Barrhead

2. This allocated housing site is divided into 2 parcels and lies to the west of Barrhead town centre. The larger parcel of land is bound by Levern Water to the east, the curtilage of a listed property to the west, the railway line to the north and a Site of Importance to Nature Conservation to the south. The smaller parcel of land is bound by the Site of Importance to Nature Conservation to the south, east and west and by the curtilage of the listed building to the north. The site is overgrown and woodland in character with areas of hard-standing and the remains of buildings to the south of the larger parcel. On my site visit I saw evidence of littering and graffiti. It is identified in the proposed plan as a Tree Preservation Area and partially as a Local Biodiversity Site.

3. The site was included in the adopted East Renfrewshire Local Plan 2011 for 120 dwellings (25 percent affordable) and a planning brief has been prepared by the council. This divides the site into 5 zones and describes the development appropriate to each zone. The planning brief states that the protection and enhancement of environmental assets are important components in a high quality design on the site. It also proposes the establishment of a robust management regime for greenspaces both within and adjacent to the development zones. The best elements of tree cover should be retained and enhanced and certain prominent tree areas have been identified for retention. Proposals should be designed to minimise the potential impact on habitats and species.

4. Given the varied characteristics of the site, a mixture of tenures and building types is encouraged to utilise the changes in levels on the site. For example, higher flats on the lower lying parts of the site. The development of the site is regarded as providing an important element for the regeneration of Barrhead generally and the adjacent new housing site to the east (SG1.1). Linkages to the town centre and from the town centre to the Fereneze Braes and the countryside beyond should be utilised/upgraded, in part, by

the provision of a riverside path. Any planning application must be accompanied by a design statement, transport assessment, ground investigations and the appropriate environmental and ecological studies including an Environmental Impact Assessment screening opinion. The council encourages the developer to enter into consultations with the local community at the earliest opportunity.

5. I agree that this site provides the opportunity to design and build a unique development with links to both the town centre to the east and the surrounding Local Biodiversity Site and countryside to the west and north. I also acknowledge its potential contribution to the regeneration of Barrhead and the provision of affordable housing in a relatively accessible location. I have considered the concerns expressed with regard to detailed matters of design/layout and the impact on the residential amenity of existing residents close to the site. However, I am satisfied that these concerns can be addressed through the implementation of the council's planning brief as well as through the proposed public consultation and subsequent assessment of any planning applications through the development management process. I note, in particular, that the trees along the railway line are identified in the planning brief as a prominent tree area worthy of retention and enhancement. I consider that the planning brief and the other policies of the proposed plan include adequate safeguards to ensure that the impact of the development on the character and nature conservation value of the site and its surrounding area would be acceptable and would in some cases result in environmental and recreational enhancements.

6. I appreciate that Homes for Scotland disputes the effectiveness of the site until a builder brings forward a viable proposal (2013 Housing Land Audit) but agree with the council that given the supportive representation submitted by those promoting the site and its potential contribution to Barrhead's regeneration, programming the majority of the site post 2020 is appropriate.

7. With regard to flooding issues, I note that a small area of this proposed housing site is included in the Scottish Environment Protection Agency's flood risk maps as being liable to flooding with 0.5 percent annual (1 in 200 year) or greater probability. Although the council's planning brief already refers to the need for a flood risk assessment, in order to be consistent with other sites, I agree that the need for a flood risk assessment should also be added to the proposed plan.

8. The suggested impact on the value of property is not a land use planning consideration.

9. Overall, I conclude that the site should remain in the proposed plan as a housing allocation.

Policy SG1.4 Dunterlie Park/Carlibar Road, Barrhead

10. Following my further information request, I note that only a small part of the site is included on the Scottish Environment Protection Agency 2014 flood data. This shows an area adjacent to the site subject to high flood risk from rivers, with a small area of medium and low risk. A small part of the site is at medium risk from surface water flooding. I acknowledge that the site is now shown at less risk from flooding than when the Scottish Environment Protection Agency objection requiring the removal of the site on flood risk grounds was submitted.

11. Accordingly, I am satisfied that the level of flood risk shown in the updated 2014 flood data does not warrant removing the site from the proposed plan but agree that, given the proximity of the Levern Water, the need for a flood risk assessment should be added to ensure that flood risk issues are fully addressed at the planning application stage.

Policy SG1.6 Glen Street/Carlibar Road, Barrhead

12. . I note that a small area of this proposed housing site is included in the Scottish Environment Protection Agency's flood risk maps as being liable to flooding with 0.5 percent annual (1 in 200 year) or greater probability. Given this and the proximity of the Levern Water, I agree that the need for a flood risk assessment should be added to the proposed plan.

Policy SG1.5 Fereneze, Barrhead

13. This site was included in the adopted East Renfrewshire Local Plan 2011 as a housing site for 40 dwellings. It is part of an agricultural field and gently slopes westwards, behind the back gardens of an existing residential estate which rises steeply from Paisley Road on the north-west fringe of Barrhead. The remainder of the field has a more pronounced gradient rising steeply westwards with a band of trees/bushes on its western end. Both areas are used for horse grazing. A band of trees/bushes lies to the north and south of the allocated site and part of its southern end falls within a Local Biodiversity Site. A considerable number of representations have been received objecting to the allocation of this site for housing and the council response is that it should be deleted from the proposed plan and returned to the green belt.

14. I note that the council's Green Belt Landscape Character Assessment appraised the visual sensitivity of this character area as high and that the landscape value against green belt objectives is rated as strong. From my site visit I concur with the council that the site is an important element of the setting of this part of Barrhead and makes an important contribution to the setting and character of the town. Its development would extend the area of visible built development both higher and further west on the Fereneze slopes. This encroachment into open countryside would be visible in views from the north-east and would have a noticeable impact on this visually sensitive part of the town's setting.

15. Scottish Planning Policy states that "where a planning authority considers it appropriate, 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.

In developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and where necessary review the boundaries of any green belt (paragraphs 49 and 50)"

16. The proposed plan identifies Strategic Development Opportunities which are intended to be the primary focus for growth. Two of these, Barrhead South (Policy M2.2) and a major brownfield regeneration proposal at Glasgow Road/Shanks Park (Policy M3)

are located in Barrhead. The deletion of this housing site and its identification as green belt would not impact negatively on the development of either of these sites. Indeed it would direct developer interest to these more appropriate locations and those other allocated housing sites, closer to the town centre, which are highlighted in the Barrhead Regeneration Framework. For the reasons given above, the non-development of this site and its designation as green belt would also serve to protect and enhance the character and landscape setting of Barrhead, one of the key functions of green belt. I did not see any evidence of recreational use on my site visit but I have noted the comments of many of the surrounding residents to the contrary. Although not a determining factor in my considerations, I acknowledge that the site's designation as green belt could potentially protect and provide access to open space.

17. Furthermore, the conclusions under Issues 2.1.1, 2.1.2 and 9.1 find that the proposed plan provides considerably in excess of the Glasgow and the Clyde Valley Strategic Development Plan requirement for private housing. Unlike at the time of the last local plan examination there is no numerical justification to allocate further sites for private housing. Given my findings on the overall housing supply issue, I am satisfied that the deletion of these 40 dwellings would not have an unacceptable negative impact upon the overall housing land supply position (private or affordable) for either Barrhead or East Renfrewshire in general. An effective, generous housing land supply would still be provided. (I also note that the delivery of the 40 houses has now been programmed beyond 2020 as part of the 2013 Housing Land Audit because a house builder is no longer involved. The council considers the site to be non-effective. No representations supporting the housing site have been received)

18. Finally, in support of the site's retention, I acknowledge that if the site were deleted, the green belt boundary would not be based on strong landscape features and would be largely formed by back gardens and some hedgerows/isolated trees. Any proposals for the site could be required to include the provision of a more robust boundary, to the west, through enhanced planting. However, I am not convinced that the creation of a more robust green belt boundary would justify the resultant adverse impact on the setting of Barrhead.

19. To conclude, I find that the development of this site for housing is 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. On balance, I consider that the provision of a more robust green belt boundary alone would not outweigh the adverse impact on the character and setting of Barrhead. Taking all of the above into account, I am satisfied that the deletion of this housing site and its designation as green belt is justified.

20. The council's "Green network and environmental management" supplementary planning guidance explains the specific elements which are included within the green network identified in the proposed plan. One of the elements is a 250 metre buffer zone around the urban fringe to improve linkages to the green belt and strengthen the green belt boundary. In order to be consistent with the approach elsewhere in the urban fringe of Barrhead, I find that the site should also be identified as part of the green network.

21. Following my further information request the council has confirmed that the primary school could accommodate the additional pupils and that the site does not fall within an area of high flood risk. This does not alter my conclusions above.

Policy SG1.7 Glen Street/Walton Street, Barrhead

22. A vacant bacon factory lies to the north-west of this site with the cleared former council depot to the south. There are areas of hard-standing and areas of scrub/ trees and bushes across the site, which has a derelict appearance. The site slopes southwards towards the Levern Water and is a key housing site, adjacent to the town centre, in the council's Barrhead Regeneration Framework.

23. I note that a large part of this site is included in the Scottish Environment Protection Agency's flood risk maps as being liable to flooding with 0.5 percent annual (1 in 200 year) or greater probability. Following my further information request, the Scottish Environment Protection Agency has confirmed that there is no existing formal Flood Protection Scheme and that none is under construction or proposed at this time. However, it is thought possible that appropriate flood management measures could be provided and the Agency does not object to the site's allocation for housing subject to a Flood Risk Assessment being undertaken to verify flood risk, flood management and the potential developable area.

24. I am satisfied that despite the site's location in an area of medium to high risk of flooding, given the up-to-date comments of the Scottish Environment Protection Agency, the housing allocation should remain. The need for a flood risk assessment should be added to the proposed plan.

Policy SG1.8 Kelburn Street/Neilston Road, Barrhead

25. I note the comments submitted, but this housing site now has detailed planning approval and at the time of my site visit, construction had commenced. The planning approval is conditional on the provision of traffic signals, pedestrian facilities and the re-alignment of Kelburn Street/Lochlibo Road/Neilston Road. Further comment on the details of the proposal would be inappropriate and I do not consider that any modifications to the proposed plan are necessary.

Reporter's recommendations:

I recommend that the following modifications be made:

1. In Schedule 8, SG1.1, after "Barnes Street/Cogan Street/Robertson Street" insert "**".
2. In Schedule 8, SG1.2, after "Chappellfield" insert "**".
3. In Schedule 8, SG1.4 after "Dunterlie Park, Carlibar Road" insert "**".
4. In Schedule 8, SG1.6 after "Glen Street/Carlibar Road" insert "**".
5. In Schedule 8, SG1.7 after "Glen Street/Walton Street" insert "**".
6. At the foot of Schedule 8 insert "* Development proposals will require to be subject to a flood risk assessment."
7. Delete housing site SG1.5 Fereneze, Barrhead and designate the site as both green belt and part of the green network on the proposals map.

Issue 9.1.2	HOUSING SUPPLY - BUSBY	
Development plan reference:	Policy SG1: Housing Supply	Reporter: Michael Cunliffe
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>SEPA (Ref 70/19) Taylor Wimpey plc (Ref 936/2)</p> <p><u>Appendix 1 – Standard Letters</u> (b) Policy SG1.44 Easterton Avenue, Busby - Common Objections List of Representees (40 reps) Standard Letter Comment SG1.44A (5 reps) (Ref 1001/1) Standard Letter Comment SG1.44B (4 reps) (Ref 1002/1)</p>		
Provision of the development plan to which the issue relates:	<p>Policy SG1.14 Main Street, Busby Policy SG1.44 Easterton Avenue, Busby</p>	
Planning authority’s summary of the representation(s):		
<p><u>(a) Policy SG1.14 Main Street, Busby</u></p> <p><u>Objection</u></p> <p><u>SEPA (Ref 70/19)</u> - Assessment of flood risk required.</p> <p><u>(b) Policy SG1.44 Easterton Avenue, Busby</u></p> <p><u>Summary of Common Objections</u> <u>(Full list of representees set out in Appendix 1 with objections set out in Appendix 2. Summarised key points are set out below.)</u></p> <ul style="list-style-type: none"> • Object to development of Easterton Avenue site when Brownfield land available. • Object to affordable housing on the Green Belt at Easterton Avenue. • Support retention of land adjacent site SG1.44 as Green Belt. • There is no suitable access road to proposed site – junction issues. • Station Road effectively becomes a single track because of the station and residents parking. • Traffic safety for children. • Developer contributions insufficient • Schools and Doctors at capacity. • Impact upon character and amenity of area. • Wildlife loss • Privacy/views loss • Potential to lead to further development • Proximity to conservation area. • Loss of productive farm land 		

- Site next to power station.
- Flood risk and drainage issues.
- Not suitable for 'particular needs' as this could lead to increased isolation and vulnerability due to location.

Other Objections

Taylor Wimpey plc (936/2) - Include as part of larger site.

Modifications sought by those submitting representations:

(a) Policy SG1.14 Main Street, Busby

SEPA (Ref 70/19) - Flood risk assessment required.

(b) Policy SG1.44 Easterton Avenue, Busby

Robert Swan (Ref 12/1), Heather Rutherford (Ref 28/1), Catherine Doherty (Ref 48/1), Raymond Doherty (Ref 49/1), Darren Doherty (Ref 50/1), Gerard McNeill (Ref 197/1), Busby Community Council (Ref 226/2), Patrick Doherty (Ref 239/1), Arthur Mulholland (Ref 282/1), Ewan Macbeth (Ref 321/1), Kirsty MacKenzie (Ref 323/1), Lesley McCreaner (Ref 353/1), Alan Collins (Ref 356/1), Jamie Roddie (Ref 357/1), David and Marjory Carey (Ref 373/1), A K Ritchie (Ref 396/1), Lisa Gemmell (Ref 426/1), Sandra McCormick (Ref 498/1), A LS MILL (Ref 499/2), Iain Fell (Ref 517/2), Kevin Corr (Ref 533/1), Christine Woods (Ref 586/1), Ishbel C Woods (Ref 587/1), Reg Woods (Ref 588/1), Roisin M Hegarty (Ref 605/1), Lesley-Anne Thomson (Ref 609/1), R R Hanvey (Ref 612/2), Eugene Kelly (Ref 671/1), Ruth Mavunga (Ref 673/1), Sandra McBride (Ref 752/1), Robert Caldwell (Ref 774/3), Gordon Smith (Ref 797/1), John W Kilmurray (Ref 798/1), Yvonne Roddie (Ref 808/1), Ian Steven Smith (Ref 838/1), Irene Cairns (Ref 849/1), Jeffrey Bailey (Ref 878/1), Mrs M Morgan (Ref 879/1), D Morgan (Ref 880/1), Erwin and Audrey Macbeth (Ref 890/1), Standard Letter Comment SG1.44A (5 reps) (Ref 1001/1), Standard Letter Comment SG1.44B (4 reps) (Ref 1002/1)

Deletion of Site SG1.44 and reallocation as Green Belt.

Taylor Wimpey plc (Ref 936/2) - Seeking inclusion of site as part of larger site release.

Summary of responses (including reasons) by planning authority:

OVERVIEW

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council's approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

(a) Policy SG1.14 Main Street, Busby**Objection****SEPA (Ref 70/19)**

SEPA raised concerns that an assessment of flood risk would be required. However, the site does not fall within or border SEPAs 1:200 flood maps. An area of flood risk is located further to the east but does not impact upon the site. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals.

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

(b) Policy SG1.44 Easterton Avenue, Busby**Objections**

Robert Swan (Ref 12/1), Heather Rutherford (Ref 28/1), Catherine Doherty (Ref 48/1), Raymond Doherty (Ref 49/1), Darren Doherty (Ref 50/1), Gerard McNeill (Ref 197/1), Busby Community Council (Ref 226/2), Patrick Doherty (Ref 239/1), Arthur Mulholland (Ref 282/1), Ewan Macbeth (Ref 321/1), Kirsty MacKenzie (Ref 323/1), Lesley McCreaner (Ref 353/1), Alan Collins (Ref 356/1), Jamie Roddie (Ref 357/1), David and Marjory Carey (Ref 373/1), A K Ritchie (Ref 396/1), Lisa Gemmell (Ref 426/1), Sandra McCormick (Ref 498/1), A L S MILL (Ref 499/2), Iain Fell (Ref 517/2), Kevin Corr (Ref 533/1), Christine Woods (Ref 586/1), Ishbel C Woods (Ref 587/1), Reg Woods (Ref 588/1), Roisin M Hegarty (Ref 605/1), Lesley-Anne Thomson (Ref 609/1), R R Hanvey (Ref 612/2), Eugene Kelly (Ref 671/1), Ruth Mavunga (Ref 673/1), Sandra McBride (Ref 752/1), Robert Caldwell (Ref 774/3), Gordon Smith (Ref 797/1), John W Kilmurray (Ref 798/1), Yvonne Roddie (Ref 808/1), Ian Steven Smith (Ref 838/1), Irene Cairns (Ref 849/1), Jeffrey Bailey (Ref 878/1), Mrs M Morgan (Ref 879/1), D Morgan (Ref 880/1), Erwin and Audrey Macbeth (Ref 890/1), Standard Letter Comment SG1.44A (5 reps) (Ref 1001/1), Standard Letter Comment SG1.44B (4 reps) (Ref 1002/1)

A significant volume of objections were received arguing the case for the deletion of the site from the Plan and its unsuitability for Housing. Concerns regarding access, infrastructure, school capacity, availability of Brownfield sites, loss of amenity, impact upon wildlife and biodiversity, increase in traffic, loss of recreation and landscape and visual impacts were raised. It was viewed the site should be re-designated as Green Belt. The community are clear they wish the site deleted from the Plan.

Comments were received regarding the need for a health assessment due to proximity to an electricity substation and that pylons cross the site. If required any assessment could be undertaken at the planning application stage.

The site was identified as a housing site (Ref H2.1) for approximately 20 units as a result of a recommendation by Reporters appointed by Scottish Government who undertook the Examination of the Plan in 2010. The site was allocated for affordable housing only with the Green Belt designation retained until a suitable affordable housing development was implemented. This caveat was included within the Adopted Local Plan and has also been included within the Proposed Plan within the notes to Schedule 9. 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.

It was the Reporters view that developing the site for affordable housing would constitute a limited incursion into the Green Belt and would not have any significant adverse impact upon the effectiveness of the Green Belt. It was noted that adequate access may be possible, development would round off the green belt and landscaping would provide a softer landscaped edge to the urban area although recognising some adverse impact upon the rear outlook from properties in Easterton Avenue.

A Development Brief (CD/37) was prepared to set out the planning requirements for the site including issues of access, design, density, landscaping, open space, pedestrian access and the need to provide a robust green belt edge. The Objectives of the Brief are set out in Section 2 with the Design Aspirations displayed under Plan C. Any development would have to be carefully designed to ensure these issues are addressed.

Overall it is viewed that the Development brief adequately addresses comments received. Other matters regarding the housing land supply position are addressed under Issue 9.1.

The site could deliver approximately 20 affordable units for Busby and help meet the social housing needs of the area. The site is included within the latest SHIP (CD/60) with an anticipated start date of 2016/17. Funding has been assigned to this site.

The site is a high priority affordable housing opportunity for the Eastwood area.

In response to comments from Busby Community Council (Ref 226/2) the Council is not seeking to release any additional land surrounding this site. This matter is addressed further under Issue 9.2.2.

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

Taylor Wimpey plc (Ref 936/2)

Comments from Taylor Wimpey requested inclusion of a larger site for housing. The response to this proposal is set out under Issue 9.2.2, but in summary the Council does not favour any further releases at this location.

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

Reporter's conclusions:

Policy SG1.14 Main Street, Busby

1. The site does not fall within the area shown in the Scottish Environment Protection Agency's flood maps as liable to flooding with 0.5 percent annual (1 in 200 year) or greater probability. There is no need to change the relevant provision in the plan.

Policy SG1.44 Easterton Avenue, Busby

2. This triangular area of agricultural land lies on the southern edge of Busby and forms part of the green belt. As indicated in paragraph 5.5.1 of the proposed plan, the purpose of the green belt policy is to direct planned growth to the most appropriate locations and support regeneration; protect and enhance the quality, character, landscape setting and

identity of towns and cities; and to protect and give access to open space within and around towns and cities. The site does not have particularly strong landscape qualities, being bounded by a railway track with electricity pylons and a communications mast appearing as prominent features to the south-west. It contributes little to the landscape setting of Busby and, as an arable field, has little or no recreational value. There is a path between the site and the railway, but this would be retained if the site were developed. Loss of the site from the green belt would not (unlike the adjacent site considered at Issue 9.2.2) lead to a narrowing of the separation between Busby and Thorntonhall.

3. Main access to the site would be from Station Road. While this road is somewhat narrowed by parked vehicles, it appears adequate for the number of additional houses (20) proposed. There would be some loss of amenity for about 20 houses in Easterton Avenue, whose rear windows would overlook the site. The effect could be minimised by sensitive layout and landscaping of the new development.

4. The proposed allocation, which confirms the status of the site in the adopted local plan, needs to be seen in the context of a substantial shortfall in the provision of affordable housing in East Renfrewshire. The site is to be allocated for affordable housing only, and would retain its green belt status until a suitable proposal for 100 percent affordable housing came forward. This would depend on the availability of public funding. The council has indicated that the site would have high priority for any funding that could be allocated. Representations cite the availability of brownfield sites elsewhere, and argue that these should be developed for affordable housing in preference to green belt land. The only brownfield housing site in Busby listed in the plan is at Main Street (SG1.14) with a capacity of 16 homes. Even if developed, in whole or in part, for affordable housing it would not negate the need for additional land for that purpose. Other suggested sites (LDP53, LDP54, LDP80, LDP82, LDP83 and LDP84) are in Barrhead and Giffnock. The former would not address affordable housing need in the Busby area, and the Giffnock site (Braidbar Quarry) scored poorly in the council's evaluation.

5. Taking all these factors into account, I conclude that the site should remain in the plan as allocated for affordable housing only, and that it should retain its green belt status until developed for that purpose.

Reporter's recommendations:

No modifications.

Issue 9.1.3	HOUSING SUPPLY - GIFFNOCK	
Development plan reference:	Policy SG1: Housing Supply	Reporter: Michael Cunliffe
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>A M Robertson (Ref 3/1) SEPA (Ref 70/4) Roger Spooner (Ref 387/6)</p>		
Provision of the development plan to which the issue relates:	<p>Policy SG1.22 Fenwick Road/Burnfield Road/Dalmeny Avenue, Giffnock Policy SG1.23 Robslee Drive, Giffnock</p>	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy SG1.22 Fenwick Road/ Burnfield Road/Dalmeny Avenue, Giffnock</u></p> <p><u>Objection</u></p> <p><u>Roger Spooner (Ref 387/6)</u> - Should include commercial development that engages public and employees as well as residential use</p> <p><u>(b) Policy SG1.23 Robslee Drive, Giffnock</u></p> <p><u>Objection</u></p> <p><u>A M Robertson (Ref 3/1)</u> Serious concern at proposed housing site due to drainage. On-going problem in area which causes sewage to overflow at the junction of Treeburn Avenue. As the operators of the site have no plans to move and there is no planning application represented, it is assumed development is not imminent. A published timescale would be useful.</p> <p><u>SEPA (Ref 70/4)</u> - Objection in principle on flood risk grounds.</p>		
Modifications sought by those submitting representations:		
<p><u>(a) Policy SG1.22 Fenwick Road/Burnfield Road/Dalmeny Avenue, Giffnock</u></p> <p><u>Roger Spooner (Ref 387/6)</u> - Seeks commercial development opportunities as component of this proposal.</p> <p><u>(b) Policy SG1.23 Robslee Drive, Giffnock</u></p> <p><u>A M Robertson (Ref 3/1)</u> - Flood risk assessment required.</p> <p><u>SEPA (Ref 70/4)</u> - Remove from Plan on flood risk grounds.</p>		

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

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council's approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

(a) Policy SG1.22 Fenwick Road/ Burnfield Road/Dalmeny Avenue, Giffnock**Objection****Roger Spooner (Ref 387/6)**

Consent was granted for the Erection of (Class 1) retail store and residential development of 45 flats in July 2008. The store is currently occupied by Wholefoods, however, there has been no progress on the residential elements of the proposal. The Council intends to monitor and review this situation. As commercial development has been provided this adequately covers the representation submitted.

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

(b) Policy SG1.23 Robslee Drive, Giffnock**Objections****A M Robertson (Ref 3/1), SEPA (Ref 70/4)**

This site was considered under the examination into the current Local Plan and retained as a housing site. The Reporter concluded that the site provided a suitable re-development opportunity. The Reporter agreed with the Council that a Development brief would be required to address issues concerning nature conservation, housing capacity, flood risk and public access.

The 2013 Housing Land Audit (CD/54) indicates development is not anticipated until 2019/20.

Comments from SEPA requested the deletion of this site on flood risk grounds. The site remains an appropriate development opportunity and forms part of the established land supply. The Council is aware of the sensitivity of the site and a planning brief will be prepared to guide and control development. Issues concerning sewage could be addressed at planning application stage.

On the basis that a Development Brief has not been currently prepared the Plan sees merit on additional text being included within the Plan to reflect Flood Risk and nature conservation issues.

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 and to

provide clarity on nature conservation, the Council would be supportive of this modification because it would not have any implications for the wider area or other policies within the LDP.

In Schedules 8 and 9 notes

Add F: Flood Risk Assessment Required.

** The development brief for site SG1.23 will require the site layout to take account of the need to safeguard areas of important urban green space to promote nature conservation.

Reporter's conclusions:

Policy SG1.22 Fenwick Road/ Burnfield Road/Dalmeny Avenue, Giffnock

1. The part of this site north of Dalmeny Avenue is fully occupied by a supermarket, while the smaller part to the south provides car parking. Unless building residential accommodation on the supermarket roof is contemplated, the street-level car park would provide the only part of the site capable of development for this purpose. However, taking the site and its surrounding area as a whole, mixed retail and residential use appears appropriate. I therefore see no need to change the proposed plan.

Policy SG1.23 Robslee Drive, Giffnock

2. The central part of this site, comprising about one third of the total area, is shown on the Scottish Environment Protection Agency's flood risk map as liable to flooding with 0.5 percent annual (1 in 200 year) or greater probability. Scottish Planning Policy states that local development plans should use the flood risk framework set out in paragraph 263. Areas at medium to high risk, such as this site, may be suitable for residential development within built-up areas provided flood protection measures to the appropriate standard already exist and are maintained, are under construction, or are a planned measure in a current flood risk management plan.

3. In response to a request for further information, the council has indicated that there are no flood protection measures in place or planned for this site, though it has referred to initial flood and drainage monitoring studies carried out by the proposed developer during the past year. Neither I nor the council has seen the result of these studies. It would be essential that any works on the site to manage flood risk did not increase the risk of flooding elsewhere. While the proposed developer has confirmed that the studies are still progressing, I have not been presented with evidence that would give me confidence that the problem could be completely resolved.

4. The Scottish Environment Protection Agency has objected to the inclusion of this site in the proposed plan. In the absence of actual or planned appropriate flood protection measures, the inclusion of the central part of the site in the local development plan would be contrary to Scottish Planning Policy. I therefore conclude that the part of the site shown on the flood risk map as being at risk of flooding (from any source) with an annual probability of 0.5 percent or greater should be removed from the allocation for housing development. This would leave two remaining areas, one to the west and one to the east, to which the allocation would still apply. On a pro-rata basis, I estimate the combined capacity of these remaining sites as 60 units. If flood studies and proposed protection measures showed that housing development on the central part of the site could be carried out with an acceptable level of risk, there and elsewhere, a planning

application for parts of this central area could still be considered. In the meantime, however, it would not be appropriate to rely on this as a contribution to the planned housing supply.

5. The council has suggested adding a footnote to Schedule 8 requiring a development brief for the site layout to take account of the need to safeguard areas of important urban green space to promote nature conservation. However, this issue was not raised in representations and I do not recommend a modification for this purpose.

Reporter's recommendations:

I recommend that the following modifications be made:

1. In Schedule 8, SG1.23, after "Robslee Drive" insert "(excluding flood risk area)". In the right-hand column, delete "100" and insert "60".
2. On the proposals map, redraw the brown line delineating SG1.23 so as to exclude that part of the site which is shown on the Scottish Environment Protection Agency flood map as being liable to flooding from any source with 0.5 percent annual (1 in 200 year) or greater probability, thereby showing two separate remaining areas to which Policy SG1.23 will continue to apply.

Issue 9.1.4	HOUSING SUPPLY – NEWTON MEARNES	
Development plan reference:	Policy SG1: Housing Supply	Reporter: Michael Cunliffe
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Charles Murray (Ref 65/2) (Ref 65/3) SEPA (Ref 70/21) Norman Graham (Ref 286/13) David McLean (Ref 444/1) Sheila McLean (Ref 445/1) W R Barr (Ref 470/3) Lynda Murray (Ref 511/2) (Ref 511/8) Neil Warren (Ref 578/13) (Ref 578/14) Newton Mearns Community Council (Ref 686/6) (Ref 686/17) (Ref 686/18) Mactaggart and Mickel Homes Limited (Ref 703/5) D Jesner (Ref 783/11) (Ref 783/14) Dawn Bell (Ref 810/1) Iain McCowan (Ref 896/8) (Ref 896/15) R W R Barr (Ref 906/2) N Barr (Ref 907/2) M M Barr (Ref 908/2)</p>		
Provision of the development plan to which the issue relates:	Policy SG1.27 Ayr Road, Newton Mearns Policy SG1.32 Broompark Drive/Windsor Avenue, Newton Mearns Policy SG1.33 Capelrig Road, Newton Mearns Policy SG1.34 Capelrig Road (Hillcrest), Newton Mearns Policy SG1.36 Greenlaw, Newton Mearns Policy SG1.38 Patterton Farm, Newton Mearns	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy SG1.27 Ayr Road, Newton Mearns</u></p> <p><u>Objection</u></p> <p><u>Lynda Murray (Ref 511/8)</u> Site SG1.27 (Ayr Road), with existing planning consent, also drains through an unadopted watercourse with no maintenance regime in place. The developer interfered with the site without planning consent and the increased run-off has already increased flooding to riparian properties. Has existing planning consent but will be built on a functional flood plain, contrary to Policy E4 Flood Risk.</p> <p><u>Neil Warren (Ref 578/14)</u> - Site SG1.27 will be built on functional flood plain going against policy</p> <p><u>Newton Mearns Community Council (Ref 686/18)</u> Site SG1.27 will be built on functional flood plain Drainage calculations flawed. No maintenance regime.</p>		

D Jesner (Ref 783/14) - Site SG1.27 with consent, is at risk of flooding contravening policy

Iain McCowan (Ref 896/15) - SG1.27 will be built on functional flood plain, modelling should be required

(b) Policy SG1.32 Broompark Drive/Windsor Avenue, Newton Mearns

Objection

Norman Graham (Ref 286/13) - Remove SG1.32 due to flood risk

David McLean (Ref 444/1) - Flood risk

Sheila McLean (Ref 445/1) - Flood risk

Lynda Murray (Ref 511/1) - Remove site due to flooding

Neil Warren (Ref 578/13) - Removal of site SG1.32 (Broom Park Drive/Windsor Avenue) 1.1 hectares.

Newton Mearns Community Council (Ref 686/6) (Ref 686/17)

Deletion of site SG1.32

Removing 1.1HAs from floodplain would gross affect on functional floodplain.

Mactaggart and Mickel Homes Limited (Ref 703/5)

Support continued allocation of site

Object to Policy D5: Protection of Urban Greenspace cover of site as could be developed for 1 to 2 houses

Absence of development does not mean it is openspace - site is privately owned and has no public access

D Jesner (Ref 783/11) - Site SG1.32 should be removed as at risk of flooding contravening policy

Iain McCowan (Ref 896/8) - SG1.32 should be removed due to flood risk

(c) Policy SG1.33 Capelrig Road, Newton Mearns

Objection

Charles Murray (Ref 65/2)

Woodland loss at Capelrig Road already started

Development will lead to greater loss of mature trees

W R Barr (Ref 470/3)

Important site for nature conservation

Community greenspace from original 60s/70s development

Driven by Council's land receipt

Impact on roads

Drainage and flood risk

Lack of consultation

R W R Barr (Ref 906/2), N Barr (Ref 907/2), M M Barr (Ref 908/2)

Against objectives of LDP

Unnecessary development in Green Belt

Not Brownfield as in national/local policy

Lack of infrastructure

Developers will not pay for all infrastructure required

Dormitory development removed from transport links

Site is important for nature conservation

Green space for local community, transferred to Council from builder in 60s/70s to protect for community

Flood risk

(d) Policy SG1.34 Capelrig Road (Hillcrest), Newton Mearns**Objection****Charles Murray (Ref 65/3)**

Why does schedule give remaining total of houses as 5 totalling 16 units when permission for 11 was granted?

New access road issues

Right of way through site

Loss of amenity - extra housing and two meter high wall

(e) Policy SG1.36 Greenlaw, Newton Mearns**Objection****Dawn Bell (Ref 810/1)**

School impact

Green Belt loss

(f) Policy SG1.38 Patterton Farm, Newton Mearns**Objection**

SEPA (Ref 70/21) - Assessment of flood risk required

Modifications sought by those submitting representations:**(a) Policy SG1.27 Ayr Road, Newton Mearns**

Lynda Murray (Ref 511/8), Neil Warren (Ref 578/14), Newton Mearns Community Council (686/18), D Jesner (Ref 783/14), Iain McCowan (Ref 896/15)

Clarification of Flood Risk issues.

(b) Policy SG1.32 Broompark Drive/Windsor Avenue, Newton Mearns

Norman Graham (Ref 286/13), David McLean (Ref 444/1), Sheila McLean (Ref 445/1), Lynda Murray (Ref 511/1), Neil Warren (Ref 578/13), Newton Mearns Community Council (Ref 686/6) (Ref 686/17), D Jesner (Ref 783/11), Iain McCowan (Ref 896/8)

Delete SG1.32 due to flood risk.

Mactaggart and Mickel Homes Limited (Ref 703/5) - Remove southern portion from D5 and D8.3 and identify as white land.

(c) Policy SG1.33 Capelrig Road, Newton Mearns

Charles Murray (Ref 65/2), W R Barr (Ref 470/3), R W R Barr (Ref 906/2) N Barr (Ref 907/2) M M Barr (Ref 908/2)

Delete site SG1.33 and retain as green space.
Site should be planted with more trees.

(d) Policy SG1.34 Capelrig Road (Hillcrest), Newton Mearns

Charles Murray (Ref 65/3) - Representee is seeking clarity on housing numbers and access.

(e) Policy SG1.36 Greenlaw, Newton Mearns

Dawn Bell (Ref 810/1) - Representee is seeking clarity on the impact upon school capacity.

(f) Policy SG1.38 Patterton Farm, Newton Mearns

SEPA (Ref 70/21) - Flood risk assessment required

Summary of responses (including reasons) by planning authority:

OVERVIEW

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council's approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

(a) Policy SG1.27 Ayr Road, Newton Mearns

Objections

Lynda Murray (Ref 511/8), Neil Warren (Ref 578/14), Newton Mearns Community Council (686/18), D Jesner (Ref 783/14), Iain McCowan (Ref 896/15)

The site was identified as a housing site (Ref H1.31) for approximately 50 units by the Reporter during the Examination into the current Local Plan. It was the Reporter's view that the site had the potential to make a contribution to the housing land supply without having a significant adverse effect on the effectiveness of the green belt or the setting of Newton Mearns.

A Development brief (CD/39) was prepared by the Council setting out the planning requirements. Subsequently planning consent (2011/0732/TP) was granted on 18/04/12. Development is now well advanced on site with units now under construction.

A Flood Risk and Drainage Impact Assessment was submitted with the application and SEPA confirmed that they had no objections to the proposal on flooding grounds on the basis of the proposed design. Scottish Water also confirmed technical approval for the drainage and SUDs works.

The site remains an effective housing site.

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

(b) Policy SG1.32 Broompark Drive/Windsor Avenue, Newton Mearns

Objections

Norman Graham (Ref 286/13), David McLean (Ref 444/1), Sheila McLean (Ref 445/1), Lynda Murray (Ref 511/1), Newton Mearns Community Council (Ref 686/6) (Ref 686/17), D Jesner (Ref 783/11), Iain McCowan (Ref 896/8)

The site at Broompark Drive/Windsor Avenue is a Greenfield site which has formed part of the established land supply since 1986. The site is programmed to deliver 8 units in total with 4 units by 2019/20 (i.e. part of the effective supply) with the remainder post 2020. The site will therefore contribute to meeting the housing land supply targets and the requirements of SPP during Phase 1 of the Plan up-to 2024/25.

Paragraphs 254-268 of the new SPP set out the policy position for 'Managing Flood Risk and Drainage'. Plans should use strategic flood risk assessment (SFRA) to inform choices about the location of development and policies for flood risk management. They should have regard to the flood maps prepared by Scottish Environment Protection Agency (SEPA), and take account of finalised and approved Flood Risk Management Strategies and Plans and River Basin Management Plans. The SPP states that residential development may be suitable in Medium-High Risk areas if flood measures are in place, under construction or planned.

The Council acknowledges that the site falls within an area subject to a 1:200 year flood probability event. Since the site was allocated in the Local Plan (2011) and the Proposed Plan was consulted upon (February-May 2013) SEPA has updated its flood risk maps. The 2014 data also reveals that the site is of high risk from river flooding and of medium and high risk from surface water flooding across the majority of the site.

A current flood risk management plan does not exist for the site. However, the site is bordered by a former playing field to the south west. It is likely that this area of urban greenspace would act as a natural flood alleviation/storage area helping to protect surrounding residential properties. If the adjacent former playing field was developed, not only could any new properties be put at risk but the storage volume provided by this greenspace would be lost.

The site was also considered at the 2010 Local Plan Examination. The Reporter indicated that given the small size of the burn and relatively low density of development mitigation measures could be incorporated within the development. The Reporter concluded the site should be retained with the requirement for a Flood Risk Assessment to be undertaken.

Flood issues remain a consideration to be fully addressed at planning application stage including identifying the developable areas and appropriate mitigation measures. In

addition these issues should be acknowledged in the LDP.

In summary although Flood Risk issues remain a consideration for the site the Council retains the view that a low density development would be suitable at this location subject to the findings of a Flood Risk Assessment and appropriate mitigation. The comments of SEPA will be taken fully into account in the decision-making process. The Council supports the sites retention in the LDP alongside the continued allocation of the adjacent playing field as Protected Urban Greenspace under policy D5 and in turn recognising its function as natural flood alleviation/storage area.

If the Reporter is so minded to recommend that the Representations are accepted and the Plan modified to reflect the need for a Flood Risk Assessment, the Council would be supportive of this modification because it would not have any implications for the wider area or other policies within the LDP.

In Schedules 8 and 9

Add F: Flood Risk Assessment Required.

Mactaggart and Mickel Homes Limited (Ref 703/5)

Support for the continued allocation of this site is noted and welcomed.

The site forms part of the effective land supply. The representation seeks the inclusion of an additional area of land to the south west of the site. This area of land is currently designated as protected urban greenspace under Policy D5 and Policy D4 Green Network and was formerly used a school playing field.

The site does not have any special environmental protection designations; however, it forms part of the green network within the area and offers bio-diversity value. The Council does not wish to see this green resource lost to development. Other more sustainable sites have been identified in the Plan to meet housing needs.

There is no requirement to release this land as an additional housing site. Strategic Policy 2: Assessment of Development Proposals provides the policy framework to consider any future applications for development.

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

For clarification there is an error on the Proposals Map for this site and the D8.4 reference is inaccurate.

In order to correct this error and provide clarity if the Reporter was so minded the Council would be supportive of removing the Policy D8.4 reference from the site.

(c) Policy SG1.33 Capelrig Road, Newton Mearns

Objections

Charles Murray (Ref 65/2), W R Barr (Ref 470/3), R W R Barr (Ref 906/2), N Barr (Ref 907/2), M M Barr (Ref 908/2)

A number of objections have been raised in connection with this Policy and the resultant environmental impact.

The site was identified as a housing site (Ref H1.37) for approximately 32 units as a result of a recommendation by Reporters appointed by Scottish Government who undertook the Examination of the Plan in 2010 (CD/02). 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 for adoption.

The site sits adjacent to an area of open space which is protected through Policies D4: Green Network, D5: Protection of Urban Greenspace and Policy D8: Natural Features. The site forms part of the green network and has nature conservation value which is recognised through its designation as a Local Biodiversity Site. The greenspace and housing site are both in the ownership of East Renfrewshire Council.

The site and associated open space was previously covered by a Norway Spruce plantation and was cleared by the Council in 2010 as it had reached maturity, was restricting access and limiting the biodiversity value of the area. The Felling Licenses which were issued by the Forestry Commission required approximately 14,300 replacement trees to be planted within a 5 year period. The Council has implemented this and has in addition secured funding through the Scottish Rural Development Fund to plant additional native woodland planting, which has now been done.

A Right of Way and Core Path run through the site and wider enhancement works proposed by the Council will formalise these and provide easier access from the surrounding residential properties and importantly from Eastwood High School, Crookfur and St Cadoc's Primary Schools.

These enhancements will also see further selective native planting, path and bridge provision, wetland and habitat creation with entrance/signage enhancement. This work is dependent on external funding and will be pursued in due course.

The Proposed Plan seeks to protect and where appropriate enhance the natural heritage and landscape features. Where a proposal for development may have an impact on these or the amenity of other open spaces an assessment will be made in order to ascertain how best to mitigate this. Wherever possible the effects will be mitigated through planning conditions ensuring on site provision. Where this is not possible, an assessment for a development contribution will be based on the environmental quality of the open space. Contributions will be based on the environmental quality of the open space. Contributions will be made based on the cost of replacing lost landscape features, habitats or amenity elsewhere in the locality. Where established greenspace is lost, a contribution will be sought to enhance other informal greenspaces in the area.

The Council is aware of the sensitivity of the site and a planning brief will be prepared to guide and control development. It is important that design and access are fully addressed.

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

(d) Policy SG1.34 Capelrig Road (Hillcrest), Newton Mearns

Objection

Charles Murray (Ref 65/3)

An error was recorded under Schedule 8. The remaining capacity for this site should read 11 not 5. Consent (2011/0229/TP) was granted for 11 units December 2012. Other

issues raised are covered in the response to site SG1.33 above.

For clarification there is an error on the Proposals Map for this site and the D8.4 reference is inaccurate.

In order to correct this error and provide clarity if the Reporter was so minded the Council would be supportive of modifying schedule 8 as follows:.

Schedule 8: Housing Sites

LP Ref	Settlement	Address	Remaining capacity
SG1.34	Newton Mearns	Capelrig Road (Hillcrest)	5 11

(e) Policy SG1.36 Greenlaw, Newton Mearns

Objection

Dawn Bell (Ref 810/1)

Outline planning consent was granted for the entire Greenlaw expansion area in 2007. The housing, education and commercial developments are either complete or well advanced. Further developments in Newton Mearns are identified at Malletsheugh/Maidenhill and Hillfield and Bracapel. As demonstrated under Issue 2.1.2 the Councils Education Department have been key contributors to the Plan in terms of meeting current and future educational needs.

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

(f) Policy SG1.38 Patterton Farm, Newton Mearns

Objection

SEPA (Ref 70/21)

SEPA indicated that an assessment of flood risk was required. However, the site does not fall within SEPAs 1:200 year flood event. Planning consent (2006/0587/TP) was granted 29/03/08 for the conversion of farm buildings and cottages to provide 5 dwellinghouses. A renewal application (2013/0170/TP) was approved 16/05/13.

The site has the benefit of planning consent and does not fall within a flood risk area.

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

Reporter's conclusions:

Policy SG1.27 Ayr Road, Newton Mearns

1. Planning permission for housing development was granted in 2012 following a flood risk and drainage impact assessment. There were no objections from the Scottish Environment Protection Agency, and Scottish Water confirmed technical approval for the drainage and Sustainable Drainage Systems (SuDS) works. The design includes a detention basin, complementary flood storage and a hydraulic throttle to prevent overloading of the exit culvert under Cheviot Drive. Construction was under way at the time of my visit (August 2014). The relevant authorities appear to be satisfied that flood

risk will be controlled to an acceptable level, and I do not consider there is any need to modify the proposed plan.

Policy SG1.32 Broompark Drive/Windsor Avenue, Newton Mearns

2. In my view, this site requires to be considered along with the contiguous area immediately to the south, which is shown in the proposed plan as urban greenspace subject to Policy D5. Together, the sites form an open area in the same ownership but without any formal public access. The combined area is heavily overgrown and contains a number of mature trees. It has some local amenity and biodiversity value, but no recreational value in its present, fenced and gated, state. The Broom Burn flows south to north along the eastern boundary of the southern area and across the northern part. A substantial proportion of both parts is included in the Scottish Environment Protection Agency's flood risk maps as being liable to flooding with 0.5 percent annual (1 in 200 year) or greater probability. Flood risk is greatest in the central portion of the combined area, and least in the south-west and north-west corners and a small part fronting Broompark Drive.

3. While some flood studies have been carried out, there is currently no plan in place for flood protection measures. It appears to me likely that some parts of the combined area could be developed for housing without being subject to unacceptable flood risk, or increasing flood risk elsewhere. I also consider that there is value in retaining a substantial part of the combined area as urban greenspace, which could provide a flood relief area, maintain biodiversity and be opened up for recreational use. However, I do not consider that the division of the combined area into separate northern (housing) and southern (greenspace) sites as shown in the proposed plan would best achieve those aims. Much of the developable area is in the south, while much of the north is at high flood risk and is better suited to greenspace use.

4. The allocation of uses across the combined area should be informed by a flood risk assessment and should provide urban greenspace equivalent in area to the southern part (but some of this greenspace would be located in the northern part). The indicative housing capacity should remain at 8 units, but apply to the combined site. A planning application that provided for more houses while meeting the greenspace and flood risk requirements could be considered on its merits. While it would not be appropriate at this stage to identify any particular area of the combined site as protected urban greenspace (Policy D5), the site, or parts of it, would still contribute to the green network (Policy D4) and should be shown as such on the proposals map.

Policy SG1.33 Capelrig Road, Newton Mearns

5. This site is part of an area of informal greenspace comprising rough grassland and bushes fringed by trees. It slopes down from Capelrig Road towards the Capelrig Burn, and appears to be outside the area identified as being at medium to high flood risk in the Scottish Environment Protection Agency's flood map. There are no obvious problems about road access, and an additional 32 houses would not in my view contribute significantly to traffic problems.

6. The development of the site would still leave a substantial green corridor along the burn to the north-west. However, the overall appearance of the area is enhanced by trees and it is important that the development retains as many of these on the site as possible, while maintaining pedestrian links into the adjacent greenspace. I agree with

the council that the site is a sensitive one and that a planning brief should be prepared to guide and control development. Taking that into account, I consider that the site should be retained for housing use.

Policy SG1.34 Capelrig Road (Hillcrest), Newton Mearns

7. This site lies between Capelrig Road and site SG1.33. It is on higher ground and has more trees. Planning permission subject to conditions was granted for 11 residential units in 2012, but development had not commenced at the time of my visit (August 2014). The matters raised in the representation would have been taken into account in granting the consent. I note that the entry in Schedule 8 is inaccurate, and agree with the council that it should be modified to a capacity of 11 houses. I also note that the application of Policy D8.4 to this site on the proposals map is inaccurate. This can be corrected as a minor error without formal modification.

Policy SG1.36 Greenlaw, Newton Mearns

8. The area covered by this policy has been developed in accordance with planning permissions granted from 2007 onwards. At the time of my visit (August 2014) it appeared that the development was nearing completion. The issue of school capacity has been taken into account by the council in granting planning permission and in planning additional educational provision. It would not be appropriate to modify the proposed plan.

Policy SG1.38 Patterton Farm, Newton Mearns

9. This site is not within the flood risk area shown on the Scottish Environment Protection Agency's flood map. It already has planning permission. There is no justification for modifying the proposed plan.

Reporter's recommendations:

I recommend that the following modifications be made:

1. In Schedule 8, SG1.32, after "Broom Park Drive/Windsor Avenue", insert "***", and at the foot of Schedule 8 insert "*** A substantial part of the area has an annual flood probability of 0.5 percent (1 in 200 years) or greater. Development proposals will require to be subject to a flood risk assessment, and 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."
2. In Schedule 8, SG1.34, in the right-hand column delete "5" and insert "11".
3. On the proposals map, remove the solid green colour from the area to the north of Dunolly Drive, Newton Mearns; delete the notation "D8.4"; extend the brown outline of SG1.32 to include this area; extend the green diagonal hatching to include the area currently within the brown outline as well as the area currently hatched; and insert the notation "D4".

Issue 9.1.5	HOUSING SUPPLY - UPLAWMOOR	
Development plan reference:	Policy SG1: Housing Supply	Reporter: Katrina Rice
Body or person(s) submitting a representation raising the issue (including reference number):		
SEPA (Ref 70/22) Mr and Mrs D J Bain (Ref 589/2) (Ref 589/3)		
Provision of the development plan to which the issue relates:	Policy SG1.42 Pollick Avenue, Uplawmoor Policy SG1.43 Uplawmoor East, Uplawmoor	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy SG1.42 Pollick Avenue, Uplawmoor</u></p> <p><u>Objection</u></p> <p><u>SEPA (Ref 70/22)</u> - Assessment of flood risk required.</p> <p><u>Mr and Mrs D J Bain (Ref 589/3)</u> Object to development of the wrong types of houses in Uplawmoor Require properties for older people, in keeping with the village Suggest bungalows Object to loss of outlook and character Lack of facilities, services and transport to support development</p> <p><u>(b) Policy SG1.43 Uplawmoor East, Uplawmoor</u></p> <p><u>Objection</u></p> <p><u>Mr and Mrs D J Bain (Ref 589/2)</u> Object to development of the wrong types of houses in Uplawmoor Require properties for older people, in keeping with the village Suggest bungalows Object to loss of outlook and character Lack of facilities, services and transport to support development.</p>		
Modifications sought by those submitting representations:		
<p><u>(a) Policy SG1.42 Pollick Avenue, Uplawmoor</u></p> <p><u>SEPA (Ref 70/22)</u> - Flood risk assessment required</p> <p><u>Mr and Mrs D J Bain (Ref 589/3)</u> - Delete site SG1.42. Plan should provide properties for older people in the village.</p>		

(b) Policy SG1.43 Uplawmoor East, Uplawmoor

Mr and Mrs D J Bain (Ref 589/2) - Delete site SG1.43. Plan should provide properties for older people in the village.

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

The following general comment is applicable to all the following sites.

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council's approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

A number of new housing sites have been released in the Proposed Plan to meet housing needs in the Lavern Valley HMA.

The Council recognises that there are limited services and facilities in the village. A detailed analysis of the 4 rural settlements was undertaken (Appendix C of the Monitoring Statement refers) to inform the Proposed Plan. This study looked at a variety of factors including role and function, infrastructure, services and facilities, public transport, current consents and previous build rates to assess whether the rural settlements could accommodate further growth.

For Uplawmoor it was concluded no additional land should be released and the sites at Uplawmoor East (SG1.43) for 39 units and Pollick Avenue (SG1.42) for 9 units would provide appropriate levels of growth for the village.

(a) Policy SG1.42 Pollick Avenue, Uplawmoor**Objections**

SEPA (Ref 70/22), Mr and Mrs D J Bain (Ref 589/3) - The site was identified as a housing site (Ref H1.45) for approximately 9 units as a result of a recommendation by Reporters appointed by Scottish Government who undertook the Examination of the Plan in 2010 (CD/02). 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 for adoption.

It was the Reporters view that early programming of development may assist in topping up the land supply and in making some contribution to the provision of affordable housing to meet local needs. In addition the sites release would result in a minor adjustment to the Green Belt boundary without prejudicing the Development Plan Strategy.

A Development brief (CD/40) was prepared by the Council setting out the planning requirements.

SEPA indicated that an assessment of flood risk was required. However, the site does not fall within SEPA's 1:200 year flood event.

The Development brief at Para 3.13 -3.14 clearly refer to the issue of addressing the needs of the elderly population and providing smaller house types. Policy SG4: Housing Mix in New Developments also aims to meet housing needs and requirements. The Brief and the Design objectives displayed in plan C clearly provide the framework for considering future applications and ensuring that proposals respect the rural character and setting of the area as well as minimising the visible impact on the surrounding countryside.

Overall it is viewed that the Development brief adequately addresses comments received.

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

(b) Policy SG1.43 Uplawmoor East, Uplawmoor

Objection

Mr and Mrs D J Bain (Ref 589/2) - The site was identified as a housing site (Ref H1.46) for approximately 39 units as a result of a recommendation by Reporters appointed by Scottish Government who undertook the Examination of the Plan in 2010. 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 for adoption.

It was the Reporters view that early programming of development may assist in topping up the land supply and in making some contribution to the provision of affordable housing to meet local needs. In addition the sites release would result in a minor adjustment to the Green Belt boundary without prejudicing the Development Plan Strategy.

A Development brief (CD/36) was prepared by the Council setting out the planning requirements. The Development brief at Para 3.13 -3.14 clearly refer to the issue of addressing the needs of the elderly population and providing smaller house types. Planning consent (2011/0128/TP) (CD/94) was approved November 2012 for 39 houses.

The planning consent supersedes comments submitted.

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

Reporter's conclusions:

Policy SG1.42 Pollick Avenue, Uplawmoor

1. This green field site is located on the southern edge of Uplawmoor and is bound by Pollick Avenue to the north, the disused railway line to the south, Pollick Burn and Glen to the west and Tannoch Road to the east. It is currently in agricultural use and identified in the proposed plan as a site for 9 houses (25 percent to be affordable).

2. This site was included in the adopted East Renfrewshire Local Plan 2011 and a planning brief has been prepared by the council which recognises that the site is visible from the immediate surrounding area and in particular from the residential properties on

Pollick Avenue and Tannoch Road. In order to ensure that the proposed dwellings are in keeping with their rural setting and the open aspect of the site, the guidance states that consideration should be given to restricting the buildings to single storey in height with a low density edge to the south-eastern boundary and a frontage along Pollick Avenue. The massing, size and space between dwellings should be varied adjacent to open countryside, follow an irregular building line and the green belt boundary strengthened through structural tree planting. The existing wetland and habitat to the south-west corner of the site should be augmented with improvements/extension to the adjacent right of way. Any proposals for the housing site should be accompanied by a Design Statement.

3. With regard to affordable housing, the planning brief requires any proposed units to meet local housing needs by being affordable to local people on modest incomes and remaining affordable as long as an affordable need remains. The planning brief recognises the need to improve the mixture of property types and sizes in Uplawmoor to reflect the increase in an aging population. In respect of this development the brief recommends that a number of smaller properties should be provided. Furthermore, Policy SG4 – Housing mix in new developments, of the proposed plan requires all new housing proposals to include smaller house types and an element of accessible and adaptable properties to meet the needs of an aging population and households with particular needs in their design. The planning brief also encourages the developer to enter into consultations with the local community at the earliest opportunity to identify and address concerns about the new development.

4. While acknowledging the concerns expressed about the capacity of Uplawmoor to accommodate further housing development, the site at Uplawmoor East (SG1.43) now has planning permission and I do not consider that the 9 additional houses proposed on this site would represent overdevelopment of the village over the plan period. No other new housing sites have been identified for Uplawmoor in the proposed plan. I am satisfied that a robust green belt boundary can be created through landscape enhancement along the disused railway line and that the concerns with regard to design and the provision of housing for elderly/retired people and the existing community can be addressed through the implementation of Policy SG4, the planning brief for the site and associated public consultation. Provided that the guidance in the council's planning brief is implemented, I do not consider the visual or landscape impacts of the proposed development to be unacceptable.

5. I note that the site does not fall within an area shown on the Scottish Environment Protection Agency Flood maps as liable to flooding with 0.5 percent annual (1 in 200 year) or greater probability. There is no need to modify the proposed plan to refer to a flood risk assessment.

6. Overall I conclude that the site should be retained for housing use.

Policy SG1.43

7. I note the comments submitted, but this housing site now has conditional planning approval and at the time of my site visit, construction had commenced. Further comment on the merits or otherwise of the housing allocation are, therefore, beyond my remit.

Reporter's recommendations:

No modifications.

Issue 9.1.6	HOUSING SUPPLY - WATERFOOT	
Development plan reference:	Policy SG1: Housing Supply	Reporter: Michael Cunliffe
Body or person(s) submitting a representation raising the issue (including reference number):		
SEPA (Ref 70/24)		
Provision of the development plan to which the issue relates:	Policy SG2.6 East Glasgow Road, Waterfoot	
Planning authority's summary of the representation(s):		
<p><u>Objection</u></p> <p><u>SEPA (Ref 70/24)</u> - Assessment of flood risk required.</p>		
Modifications sought by those submitting representations:		
<u>SEPA (Ref 70/24)</u> - Flood risk assessment required.		
Summary of responses (including reasons) by planning authority:		
<p><u>Policy SG2.6 East Glasgow Road, Waterfoot</u></p> <p><u>Objection</u></p> <p><u>SEPA (Ref 70/24)</u> SEPA indicated that an assessment of flood risk was required. However, planning consent (2011/0802/TP) (CD/95) was granted on 21/11/2012 for 28 units. SEPA were consulted upon the application and did not raise any concerns at that stage. The site is currently under construction with the 8 affordable and a number of the market units built and occupied. The granting of consent therefore addresses this representation.</p> <p><u>It is not proposed to modify the Plan based upon the above.</u></p>		
Reporter's conclusions:		
<p>1. Only a small part of the site is shown on the Scottish Environment Protection Agency's flood map as being at risk of flooding with an annual probability of 0.5 percent (1 in 200 years) or greater, and planning permission for housing development has already been granted and implemented. There is therefore no need to change the proposed plan.</p>		
Reporter's recommendations:		
No modifications.		

Issue 9.2.1	SUBMITTED HOUSING SUPPLY - BARRHEAD	
Development plan reference:	Policy SG1: Housing Supply Policy SG2: Distribution of New Housing Schedule 10: Distribution, Capacity and Phasing of Additions to the Housing Land Supply	Reporter: Katrina Rice
Body or person(s) submitting a representation raising the issue (including reference number):		
L Mackay and R Saurin (Ref 195/1) Ron Murray and Persimmon Homes (Ref 763/1)		
Provision of the development plan to which the issue relates:	New Housing Development Locations: LDP48 Fereneze Garden Centre LDP55B The Hurllet	
Planning authority's summary of the representation(s):		
<p><u>(a) LDP48 Fereneze Garden Centre</u></p> <p><u>Objection</u></p> <p><u>Ron Murray and Persimmon Homes (Ref 763/1)</u> Non-inclusion of site: Fereneze Garden Centre, Lochlibo Road Housebuilder identified (Persimmon) Forms defensible Green Belt boundary Continuation of existing housing Mix of family housing, 50-60 units, 2.55ha Available and effective Will be developed immediately if allocated LDP should include a strategy to replace sites that become non-effective Shortfall in housing figures (2009-2017) Sites in HLS may not be delivered in timescales due to ownership ground conditions etc. Presumption in releasing sites in Council ownership against neighbouring sites that score the same in Site Evaluation Sites must be released to make up shortfall and non-delivery from SDOs/masterplan areas</p> <p><u>(b) LDP55B The Hurllet</u></p> <p><u>Objection</u></p> <p><u>L Mackay and R Saurin (Ref 195/1)</u> Site LDP55B should be removed from Green Belt and allocated for early release housing. Site is available immediately, suitable for 30 dwellings If Brownfield land is to be used as a priority it makes sense to include this site as it is vacant and derelict land. Shanks will take a long time to develop with ownership and contamination issues. Site is enclosed by development and does not encroach into the green belt. Development could be flattened, with improved junction and connection to the green</p>		

network/wildlife corridor.

Development could have increased sheltered housing due to proximity to bus stops and other amenities.

Site Evaluation Assessment, site scoring should be amended:

Q1 - as previously developed land (+3)

Q3 - would be improvement to the environment (+3)

Q5 - site does not impact on SSSI and outwith local biodiversity sites (0)

Q8 - owners known and willing to release land, development would take place outwith flood area, existing road can be used with improved access, density of 30 units should not affect road network, do not consider there are significant development constraints. (-3)

Q9 - could be higher provision than 25% (1)

From -8 amend total scoring to +9

Modifications sought by those submitting representations:

(a) LDP48 Fereneze Garden Centre

Ron Murray and Persimmon Homes (Ref 763/1) - Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.
Removal of site from Green Belt.

(b) LDP55B The Hurlet

L Mackay and R Saurin (Ref 195/1) - Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.
Removal of site from Green Belt.

Summary of responses (including reasons) by planning authority:

OVERVIEW

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council's approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

A number of new housing sites have been released in the Proposed Plan to meet housing needs in Barrhead, such as the master plans at Shanks and Barrhead South and sites at Blackbyres Court and North Darnley Road.

(a) LDP48 Fereneze Garden Centre

Objection

Ron Murray and Persimmon Homes (Ref 763/1)

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

The site lies to the South West fringe of Barrhead and comprises 2 parcels of land separated by Gateside road. The smaller section includes the former Fereneze Garden Centre and the larger an area of undulating grassland/field.

The site was identified as a preferred site under Option 2B of the MIR (CD/03) but was removed following a review of the land supply and effectiveness.

Issues identified in the site evaluation were in relation to the effectiveness of the site and impact of the development.

The Landscape Character Assessment (LCA) (CD/45) identifies the Green belt landscape character as being of moderate value. The site represents an intrusion into the Greenbelt and makes a positive contribution to this part of the Green Belt. The site acts as a strong green gateway into/out of Barrhead and development may adversely affect the visual setting and lead to coalescence between Barrhead and Neilston. Development may not form a logical extension to the settlement form.

It is accepted that a house builder is now actively involved with the site, which was not the position when the site was evaluated at Proposed Plan stage. The representation also states that the site is effective and deliverable. Further information was submitted specifying delivery of the site in the short term.

The Council recognises the merits of this site and the potential for the site to be delivered early in the plan period and the redevelopment of a partial Brownfield site. However, the impact upon the Green Belt is a key issue and as there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.

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

(b) LDP55B The Hurlet

Objection

L Mackay and R Saurin (Ref 195/1)

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

This Brownfield site is located to the North of the railwayline in Barrhead and is currently grassed with some hard standing. The area proposed is a smaller site than assessed in the Site Evaluation under ref LDP 55B.

The railway establishes a strong Green Belt boundary. The LCA identifies the Green belt landscape character as being of moderate – strong value. The site falls within an area of Green Belt of good quality 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 Plan to meet housing needs.

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 not proposed to modify the Plan based upon the above.

Reporter's conclusions:

Overview

1. The conclusions under Issues 2.1.1, 2.1.2 and 9.1 find that the overall vision and development strategy of the proposed plan is appropriate and that adequate housing land has been provided in line with the requirements set out in the Glasgow and the Clyde Valley Strategic Development Plan. The proposed plan provides considerably in excess of the strategic development plan requirement for private housing and adequate justification is provided for not meeting the affordable housing requirement. There is no numerical justification to allocate further sites for private housing.

LDP48 Fereneze Garden Centre

2. This green belt site is located to the south of Gateside and south-west of Barrhead. It consists of 3 parcels of land, 2 agricultural fields on either side of Wraes View and north-east of Gateside Road and a garden centre and house south-west of Gateside Road. The proposed site is a mix of brownfield and greenfield land but the brownfield element is separated from the existing built-up area by the larger greenfield part of the site and Gateside Road. This lessens the weight to be attached to its partial brownfield status. The north-east of the site is identified as a Local Biodiversity Site and the entire site is part of the green network.

3. I note that the council's Green Belt Landscape Character Assessment identifies the green belt landscape character of this area as being of moderate value. The existing green belt boundary lies to the north-east of the site and is marked by woodland, the Lavern Water watercourse and the boundary with an adjoining depot site. It is proposed that the new green belt boundary would be marked to the north by the railway line, to the south by Lochlibo Road and by a strengthened tree belt, to the west, beyond the garden centre. I accept that a new, defensible green belt boundary could be achieved if the site were to be developed.

4. When leaving Barrhead along Lochlibo Road and past the proposed site there is currently a strong impression of leaving the built-up urban area and entering the countryside. Driving towards Barrhead and past the proposed site, this rural character is also very much evident. This adds to a sense of separation between Barrhead/Gateside and Neilston. The existing housing development at Wraes View is at a lower level and largely hidden from view. I consider that the proposed site currently contributes towards a very distinct break between the built-up areas of Barrhead/Gateside and nearby Neilston and makes a positive contribution to this part of the green belt. Its development would have an adverse impact on the rural character of this stretch of Lochlibo Road, on the landscape setting of Gateside and would significantly reduce the separation distances between these settlements. The resultant intrusion into the green belt would unacceptably increase the potential for coalescence.

5. In any event, adequate new housing sites have been provided elsewhere in the proposed plan to meet the housing needs of East Renfrewshire. The allocation of this site for housing would direct development away from those master planned areas and other housing sites identified in Barrhead and would not be in line with the development strategy of the proposed plan. I, therefore, find that there is insufficient justification for the proposed development of this site and that the resultant incursion into the green belt would be unacceptable. The fact that a house builder has now been identified, the effectiveness of the site, its inclusion in 2 spatial options in the council's Main Issues Report and the proposed mix of family housing/affordable housing do not alter my conclusion that the site should remain in the green belt.

LDP55B The Hurlet

6. This triangular, 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. It is heavily overgrown with vegetation and is identified as part of the green network. The proposed site is clearly separated from the main built-up area of Barrhead and the M3 master plan area by the railway line. Residential development on the proposed site would encroach into an area of green belt which is currently important in separating Barrhead from Nitshill. The result would be an isolated triangle of non-green belt land extending north of the railway line, which forms the existing highly defensible green belt boundary. This would direct development away from those master planned areas and other housing sites identified by the council elsewhere in Barrhead such as the major regeneration proposal at the nearby Glasgow Road/Shanks Park site (Policy M3) and would not be in line with the development strategy of the proposed plan. I appreciate that a new defensible boundary could be achieved along the roads to the east and west of the site but also note that the council's Green Belt Landscape Character Assessment identifies the green belt landscape character of this area as being of moderate to strong value.

7. Taking all of the above into account, together with the lack of need in Barrhead or East Renfrewshire for additional housing land, I do not consider that the incursion into this parcel of green belt is justified either by the proposed site's brownfield nature, the suggested improvements to the environment and amenity of the area or the higher level of provision of affordable housing offered. The disagreement with regard to the scoring in the council's site evaluation does not alter my opinion that the site should remain in the green belt.

Reporter's recommendations:

No modifications.

Issue 9.2.2	SUBMITTED HOUSING SUPPLY - BUSBY	
Development plan reference:	Policy SG1: Housing Supply Policy SG2: Distribution of New Housing Schedule 10: Distribution, Capacity and Phasing of Additions to the Housing Land Supply	Reporter: Michael Cunliffe
Body or person(s) submitting a representation raising the issue (including reference number):		
Eddie Casey (Ref 91/1) Busby Community Council (Ref 226/3) Taylor Wimpey plc (Ref 936/1)		
Provision of the development plan to which the issue relates:	New Housing Development Locations: LDP17 (part) Wester Farm LDP20A/B Easterton Avenue LDP 75: Field Road	
Planning authority's summary of the representation(s):		
<p><u>(a) LDP17 (part) Wester Farm</u></p> <p><u>Objection</u></p> <p><u>Eddie Casey (Ref 91/1)</u> Non-inclusion of site Site has been promoted through previous Local Plans as part of a larger site. When site refused by Reporter it was acknowledged that the northern part of the site, subject of this rep, would form a logical extension to Busby's boundary. No issue of coalescence Logical extension to Busby/Urban fringe location Railway and school within walking distance as well as other services and infrastructure Site favourable in terms of sequential approach with shortfall of Brownfield No loss of amenity Robust boundary could be formed No known environmental designations No known contamination PAN 2/2010 compliant - Site is effective, available, marketable, infrastructure supported Affordable housing can be provided at 25% provide landscaping, children's play space, open space.</p> <p><u>(b) LDP20A/B Easterton Avenue</u></p> <p><u>Objection</u></p> <p><u>Taylor Wimpey plc (Ref 936/1)</u> Non Inclusion of Site - LDP20A/B Site Evaluation did not consider involvement from developer or potential for short term</p>		

delivery

Question if housing supply is sufficiently generous or flexible in line with SPP

Shortfall in overall SDP housing target

SDOs may not deliver short to medium term housing

Require genuine range of sites

Site is effective

Affordable housing alone unlikely to be delivered due to funding on SG1.44

Expansion of site for market housing would enable delivery of some affordable housing

Site could enhance Green Belt boundary and Green Networks

(c) LDP 75 Field Road Busby

Objection

Busby Community Council (Ref 226/3) - Area overdeveloped, oppose any further development here.

Modifications sought by those submitting representations:

(a) LDP17 (part) Wester Farm

Eddie Casey (Ref 91/1)

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

Removal of site from Green Belt.

(b) LDP20A/B Easterton Avenue

Taylor Wimpey plc (Ref 936/1)

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10 – 150 units.

Removal of site from Green Belt.

(c) LDP 75 Field Road Busby

Busby Community Council (Ref 226/3) - Site should be protected from further development.

Summary of responses (including reasons) by planning authority:

OVERVIEW

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council's approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

A number of new housing sites have been released in the Proposed Plan to meet housing needs in the Eastwood HMA, such as the SDO at Malletsheugh/Maidenhill and sites at Hillfield and Barcapel.

(a) LDP17 (part) Wester Farm**Objection****Eddie Casey (Ref 91/1)**

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

This green field site is located to the south west of Busby. A larger site was assessed in the site evaluation; however, this representation is promoting the northern part of the site. The Landscape Character Assessment (LCA) identifies the Green belt landscape character as being of moderate – strong value.

The existing mature tree belt and Westerton Avenue/Lane provide robust boundaries. The release of this site may also expose a wider area of Green Belt to the South to development pressure.

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 Plan to meet housing needs.

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 not proposed to modify the Plan based upon the above.

(b) LDP20A/B Easterton Avenue**Objection****Taylor Wimpey plc (Ref 936/1)**

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

This large green field site lies to the South of Busby and is bounded by the railwayline, East Kilbride Road and existing residential estate. The LCA identifies the Green belt landscape character as being of moderate – strong value.

LDP Site Ref 20B was identified as a preferred site under Option 2B of the MIR (CD/03) to assist with the delivery of the adjacent affordable housing site SG1.44. However, the site was removed following a review of the land supply and comments received to the consultation. Site LDP20A is the subject of this representation.

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 makes a positive contribution to 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 reduce the current rural quality and feel of the area.

It is recognised that the information submitted indicates that mitigation planting will assist with strengthening the landscape character, protect settlement separation and improve the urban edge. It is proposed that development will be kept away from high point of site with land set aside for open space.

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 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 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 not proposed to modify the Plan based upon the above.

(c) LDP 75 Field Road Busby

Busby Community Council (Ref 226/3)

The Community Council objected to any further development at this location. Consent was granted for 3 houses (2010/0810/TP) (CD/96) on the former overflow carpark for the hotel. There is limited space for further development opportunities. Strategic Policy 2: Assessment of Development Proposals provides the policy framework to consider any future applications for development.

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

Reporter's conclusions:

Overview

1. The conclusions under Issues 2.1.1, 2.1.2 and 9.1 find that the overall vision and development strategy of the proposed plan is appropriate and that adequate housing land has been provided in line with the requirements set out in the Glasgow and the Clyde Valley Strategic Development Plan. The proposed plan provides considerably in excess of the strategic development plan requirement for private housing and adequate justification is provided for not meeting the affordable housing requirement. There is no numerical justification to allocate further sites for private housing.

LDP17 (part) Wester Farm

2. The site is a relatively flat field currently used for horse grazing, and lies to the south of the built-up area of Busby from which it is separated by a belt of mature trees following the line of a dismantled railway. This tree belt provides a strong boundary to the green belt. The boundary between the site and the fields to the south is much weaker, though it could be strengthened by appropriate landscaping. The site, as part of the green belt, makes a moderate contribution to the landscape setting of Busby, though that setting is compromised in this location by rail and electricity infrastructure. The site is fairly well contained. Its loss would not result in serious landscape damage. No issues of coalescence would arise if it were developed for housing. Its recreational value (other than for equestrian purposes) appears limited.

3. There is reasonable access along Westerton Avenue. Though narrow in places, it would be adequate for a small development. The site is within easy walking distance of Busby railway station, which is an advantage in terms of sustainable transport. If there were a shortage of housing land in this part of East Renfrewshire, this site would merit consideration for release. However, the proposed plan makes sufficient provision elsewhere. In these circumstances, the arguments for retention as part of the green belt outweigh those favouring development.

LDP20A/B Easterton Avenue

4. The combined sites occupy a large area of farmland to the south-east of Busby. The topography is steep in places, including the eastern part of the site adjoining East Kilbride Road. The site forms part of a relatively narrow (700-800 metres) section of green belt separating Busby from Thorntonhall. The proposal would narrow the gap still further, to less than 500 metres. One of the purposes of the green belt is to prevent coalescence of settlements. By bringing the edge of Busby significantly closer to Thorntonhall, the separation value of the green belt would be weakened.

5. The representation argues that the existing green belt boundary formed by the garden fences of houses in Easterton Avenue and Kippen Drive is weak, and that the proposed development would allow a stronger boundary aligned with natural features. However, the price of achieving that would be a major loss of green belt land, and in my view the adverse effect of a reduction in green belt width in this relatively narrow corridor would outweigh the benefit of a stronger boundary. In terms of landscape effects, the existing landscape is of moderate value and I accept that the development could be sensitively planned so as to fit with the topography and reduce external visibility. It would, however, be very visible from the houses to the north, and would impact on existing residential amenity there.

6. Road access could be taken both from East Kilbride Road and from Station Road. The former could be problematic given the difference in levels and the layout of the main road, where the site entrance would be close to the end of a section of dual carriageway. A roundabout appears the most likely solution. Substantial engineering works to form a safe access and a reasonable gradient within the site would further affect the landscape. Station Road is relatively narrow with extensive roadside parking, and in my view would not be suitable to serve a site of this size.

7. The representation maintains that development of the site, or part of it, for mainstream private housing could support the development of the adjacent site (SG1.44) for affordable housing. Without enabling development of this kind, the affordable housing site would be entirely dependent on public funding. The council, however, accepts that position and has accorded site SG1.44 a high priority for the allocation of funds. The operation of Policy SG5 will ensure that affordable housing is provided through the development of other sites in more suitable locations across East Renfrewshire.

8. It is argued that the site, with a single developer actively involved, could be developed relatively quickly to deliver houses in the short to medium term, whereas the proposed plan's strategic development areas would take longer for master planning, infrastructure and developer engagement. However, the proposed plan provides sufficient housing land to meet short/medium term needs. With an estimated capacity of 180 houses, the allocation of this site would be contrary to the plan's strategy by reducing the pressure for development on brownfield and other more appropriate sites.

9. The proposed plan provides a generous supply of housing land for each time period, and there is no need to add sites such as this which would adversely affect the integrity of the green belt. I conclude that the site should remain as part of the green belt.

LDP75: Field Road

10. This is a very constricted site between Field Road and the White Cart Water. Planning permission for three houses was granted in 2010, and at the time of my visit (August 2014) some site preparation work had been carried out. It is difficult to see how any more houses could be accommodated on this site or on adjacent land. While I accept the point made by the community council, the prospect of further development appears to me remote, and I do not consider that there is any need to alter the proposed plan.

Reporter's recommendations:

No modifications.

Issue 9.2.3	SUBMITTED HOUSING SUPPLY - CLARKSTON	
Development plan reference:	Policy SG1: Housing Supply Policy SG2: Distribution of New Housing Schedule 10: Distribution, Capacity and Phasing of Additions to the Housing Land Supply	Reporter: Michael Cunliffe
Body or person(s) submitting a representation raising the issue (including reference number):		
Mactaggart and Mickel Homes Limited (Ref 703/12) (Ref 703/15)		
Provision of the development plan to which the issue relates:	New Housing Development Locations: New Site Beechlands Drive LDP13 Flenders Farm East and Newford	
Planning authority's summary of the representation(s):		
<p><u>(a) Beechlands Drive</u></p> <p><u>Objection</u></p> <p><u>Mactaggart and Mickel Homes Limited (Ref 703/12)</u> Non-inclusion of site: Promoting land for housing allocation Disagree that it is open space, no public access to site TPO trees can be protected or mitigated if developed Site could be developed for single or two semi-detached properties Opportunity for bespoke architecture, retaining some tree belt/green link Small site would have little impact on infrastructure or facilities</p> <p><u>(b) LDP13 Flenders Farm East and Newford</u></p> <p><u>Objection</u></p> <p><u>Mactaggart and Mickel Homes Limited (Ref 703/15)</u> Non-inclusion of site: LDP13 Flenders Farm East and Newford, Clarkston Promoting land for housing allocation</p>		
Modifications sought by those submitting representations:		
<p><u>(a) Beechlands Drive</u></p> <p><u>Mactaggart and Mickel Homes Limited (Ref 703/12)</u> Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10. Removal of site from D5 Urban Green space.</p>		

(b) LDP13 Flenders Farm East and Newford**Mactaggart and Mickel Homes Limited (Ref 703/15)**

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.
Removal of site from Green Belt.

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

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council's approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

A number of new housing sites have been released in the Proposed Plan to meet housing needs in the Eastwood HMA, such as the SDO at Malletsheugh/Maidenhill and sites at Hillfield and Barcapel.

(a) Beechlands Drive**Objection****Mactaggart and Mickel Homes Limited (Ref 703/12)**

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

This area of land is currently designated as protected urban greenspace under Policy D5 and Policy D8: Natural Features as a Tree Preservation Order (TPO) area.

The TPO designation 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 Council does not wish to see this green resource lost to development. Other more sustainable sites have been identified in the Plan to meet housing needs.

There is no requirement to release this land as an additional housing site and no justification for the loss of this area of important urban greenspace. Strategic Policy 2: Assessment of Development Proposals provides the policy framework to consider any future applications for development. The site should be retained as protected urban greenspace under Policy D5.

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

(b) LDP13 Flenders Farm East and Newford**Objection****Mactaggart and Mickel Homes Limited (Ref 703/15)**

An objection was received regarding the non inclusion of the site as a preferred housing

site under Policy SG2 and Schedule 10.

These large green field sites lie to the South of Clarkston. Two parcels of land are promoted separated by Glasgow Road. The larger site to the west of Glasgow road is bounded by existing residential units with open fields beyond. The eastern parcel is bounded by Glasgow Road, Williamwood High School with open views and fields beyond. The Landscape Character Assessment (LCA) identifies the Green belt landscape character as being of moderate – strong value.

The scale of development proposed would result in a significant intrusion into the Greenbelt and reduction in the gap between Clarkston and Newton Mearns and Waterfoot. The site makes a positive contribution to this part of the Green Belt. The site acts as a strong green gateway into/out of the area. Development would reduce the current rural quality and feel of the area.

It is recognised that the submitted Development Framework identifies areas suitable for development and those unsuitable and proposed mitigation measures. Regard is given to landscape character and design.

It is accepted that a house builder is actively involved with the site. The representation also states that the site is effective and deliverable.

Notwithstanding the above, the 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 Plan to meet housing needs. In addition, given the scale (450 units) and location it could undermine the progress of the Development Strategy and delivery of one of the key master plan areas at Malletshuegh/Maidenhill/ Newton Mearns (Policy M2.1).

As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.

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

Reporter's conclusions:

Overview

1. The conclusions under Issues 2.1.1, 2.1.2 and 9.1 find that the overall vision and development strategy of the proposed plan is appropriate and that adequate housing land has been provided in line with the requirements set out in the Glasgow and the Clyde Valley Strategic Development Plan. The proposed plan provides considerably in excess of the strategic development plan requirement for private housing and adequate justification is provided for not meeting the affordable housing requirement. There is no numerical justification to allocate further sites for private housing.

Beechlands Drive

2. The site slopes steeply down from Beechlands Drive to Mearns Road, which is 18 metres lower, and the average gradient is 1:3. There is dense coverage with mature deciduous trees, which are covered by a Tree Preservation Order. Development of the site to accommodate one or two houses would involve extensive engineering works and a

major loss of trees, though the developer proposes to retain some trees on the lower part of the site and along the western boundary.

3. The site makes a valuable contribution to the character and appearance of the surrounding area by providing an attractive green feature that relieves the predominant pattern of housing. It also contributes to biodiversity, and the presence of an informal path indicates some recreational use. While limited development retaining some trees would be possible, there is no need for additional infill sites such as this to meet housing requirements. The loss of green space would therefore outweigh any benefits from developing the site. I conclude that it should remain as protected urban greenspace under Policy D5.

LDP13 Flenders Farm East and Newford

4. This large area of farmland to the south of Clarkston is in two parts, with Eaglesham Road separating the smaller Newford site (a single field) from the main Flenders area to the west. There is some difference in landscape character between the two. Flenders Farm East has undulating topography with arable fields, grassland, trees and hedgerows. Its distinctly rural appearance gives way abruptly to the back gardens and houses of Hillend Road and Glendoune Road. The developer suggests that the site could be developed so as to avoid the higher ground, and that external visibility of new development would be limited.

5. The Flenders Farm East site is part of a section of green belt that separates Clarkston from Newton Mearns, and provides a semi-rural landscape setting and recreational opportunities for the two communities. This green area includes Greenbank House and Garden (National Trust for Scotland) just to the west of the site. While there would be little direct visual impact on the setting of the house and garden from developing the site, their rural context would be significantly altered. The green corridor between Clarkston and Newton Mearns would be narrowed by almost half. This would be a major incursion into the green belt that would undermine its purposes as set out in section 5.5. of the proposed plan.

6. The Newford part of the site is flatter and comprises a field whose boundaries are well-defined by topography, hedgerows, Eaglesham Road and the grounds of Williamwood High School. The proximity of the school buildings and of houses at Millerston about 100 metres south of the site on the same side of Eaglesham Road give a semi-urban character to the site's surroundings. Development of the Newford site would not lead to any significant reduction in the separation of communities (Millerston being only a small isolated group of houses), in the landscape setting of Clarkston or in recreational opportunities.

7. If there were a shortage of housing land in this part of East Renfrewshire, the Newford part of the site would merit consideration for release. However, the proposed plan makes sufficient provision elsewhere. In these circumstances, the arguments for retention as part of the green belt outweigh those favouring development. The green belt arguments weigh much more heavily against the Flenders Farm East site, which is also of such a size that its release would undermine the proposed plan's strategy of concentrating housing development on brownfield sites and masterplanned areas. I therefore conclude that the site as a whole should remain as part of the green belt.

Reporter's recommendations:

No modifications.

Issue 9.2.4	SUBMITTED HOUSING SUPPLY EAGLESHAM	
Development plan reference:	Policy SG1: Housing Supply Policy SG2: Distribution of New Housing Schedule 10: Distribution, Capacity and Phasing of Additions to the Housing Land Supply	Reporter: Michael Cunliffe
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>George Strang and Sons (Ref 60/1) Kenneth Wharton (Ref 75/5) CALA Homes (West) and Paterson Partners (Ref 414/2) Claire Wharton (Ref 419/3) (Re 419/9) (Ref 419/10) Scottish Water (Ref 662/1) Elaine Shannon (Ref 947/2)</p> <p>Appendix 1 – Standard Letter Standard Letter Comment SG10A (69 reps) (Ref 1004/1)</p>		
Provision of the development plan to which the issue relates:	<p>New Housing Development Locations: LDP34 Alnwick Drive LDP40A and LDP40B Humble Road LDP78 Waukers Farm, Eaglesham Site Evaluation</p>	
Planning authority's summary of the representation(s):		
<p><u>(a) LDP29 Mid Borland Farm LDP30 East Glasgow Road</u></p> <p><u>Support</u></p> <p><u>Claire Wharton (Ref 419/10)</u> Support retention of sites LDP29 Mid Borland Farm LDP30 East Glasgow Road Eaglesham as Green Belt. Accessibility to public transport has not changed since 2011 MIR Revised scoring method unjustified and unexplained (Site Evaluation) and has rescored sites disproportionately to others placing sites at increased risk of development. Site Evaluation – Request the 'Q4 Accessibility' Score be changed back to 0</p> <p><u>Objection</u></p> <p><u>Elaine Shannon (Ref 947/2)</u> Concerned about loss of Green Belt between East Kilbride, Eaglesham, Waterfoot and Newton Mearns Eaglesham will lose village charm if more development takes place</p> <p><u>(b) LDP34 Alnwick Drive</u></p> <p><u>Objection</u></p> <p><u>Scottish Water (Ref 662/1)</u> Object to non-inclusion of site Alnwick Drive, Eaglesham (LDP34)</p>		

Site is no longer required by Scottish Water and development would prevent dereliction
 Site could provide a mix of house types and tenure and would deliver a range and choice of housing sites
 Site adjoins existing urban area
 Site could contribute to supply of generous land supply
 Site is effective
 Site would be compatible with surrounding uses
 In sustainable location and has access to public transport
 Site makes no contribution to Green Belt - Inclusion illogical given village boundaries, topography, does not contribute to sense of openness, limited views into site
 Site does not enhance the character, quality, landscape setting or identity of Eaglesham
 Does not give access to open space
 Site should be removed from Green Network
 Scottish Water is willing to work with Council to explore ways additional land owned by Scottish Water could be used to enhance Green Network
 Revision of Green Network boundary would be more logical following Polnoon development

(c) LDP40A and LDP40B Humbie Road

Support

Claire Wharton (Ref 419/3)

Support retention of sites 40A and 40B Humbie Road, Eaglesham as Green Belt and all sites evaluated under 6.6 Eaglesham and Waterfoot.
 Eaglesham and Waterfoot are rural settlements, distinct and isolated from others. Further release of Green Belt land here is unsustainable due to lack of services, employment and public transport.
 Expansion would destroy rural village character and attractiveness
 Revised scoring method unjustified and unexplained (Site Evaluation) and has rescored these sites disproportionately to others placing sites at increased risk of development.
 Sites should be rescored in light of 200 signature petition against 2012/0612/TP.
 LDP40a Humbie Road 'Impact of Development' score changed back to -6, 'affordable housing' changed to 0, 'community benefits' changed to 0
 LDP40b Humbie Road 'Impact of Development' score changed back to -6, 'Effectiveness' changed back to -6

Standard Letter Comment SG10A (69 reps) (Ref 1004/1)

Support retention of sites 40A and 40B Humbie Road, Eaglesham as Green Belt and all sites evaluated under 6.6
 Eaglesham and Waterfoot.
 Eaglesham and Waterfoot are rural settlements, distinct and isolated from others. Further release of Green Belt land here is unsustainable due to lack of services, employment and public transport.
 The extent to which Eaglesham and Waterfoot can be developed has been reached without spoiling their rural character distinct from other settlements in ER.
 Revised scoring method has rescored these sites disproportionately to others placing sites at increased risk of development.
 Site should be rescored in light of 200 signature petition against 2012/0612/TP.
 LDP40a Humbie Road 'Impact of Development' score changed back to -6,
 LDP40b Humbie Road 'Impact of Development' score changed back to -6, 'Effectiveness' changed back to -6

LDP40B Humbie Road**Objection****CALA Homes (West) and Paterson Partners (Ref 414/2)**

Non-inclusion of site LDP40B

Council does not meet SDP housing target in figures and insufficient land has been allocated to meet requirement of 5700

It is imperative housing sites are released in the short term

Council have not followed PAN2/2010 to assess site effectiveness

Council assumes annual average build rate - concerned this is an assumption and creates doubt about delivery

Have not specifically defined housing shortfall to be met by emerging development strategy in proposed plan - derived from calculations in monitoring statement this is 1652.

Require 'generosity allowance'. South Ayrshire have set a generosity allowance of 20%, East Renfrewshire only 4%/179 more homes.

Strategy needs to focus on releasing sites capable of being effective in short term, additional sites therefore be required

Development strategy offers an unacceptable risk of failing to deliver its proposed 4100 homes (notwithstanding the SDP requirement of 5700)

If 5 year land supply not met criteria for identifying additional sites should be used.

Council states LDP approval will make up shortfall - but only if allocated sites for that period are immediately effective

Only when the annual audit process in the future proves that the development strategy is working can it be demonstrated that no further sites are required

As the requirement is not being met and additional manageable sites are required - site LDP40B Humbie Road, Eaglesham (under MIR as LDP41 submitted by Paterson Partners) is such a site

Site LDP40B:

Meets visions and principles of SDP and LDP in delivering sustainable economic growth

Site has infrastructure, construction can commence immediately and planning obligation package to mitigate impacts

Is effective (additional report supplied)

Site Evaluation Assessment: LDP40B

Q4 change from -3 to -2

Q8 -3 to -1

Q9 0 to 1

Q10 0 to 2

Overall score of -9 changed to -3 release from Green Belt

(d) LDP78 Waukers Farm, Eaglesham**Objection****George Strang and Sons (Ref 60/1)**

Object to non-inclusion of site LDP78 Waukers Farm, Eaglesham in LDP

Principal of inclusion has been supported at earlier stages of the plan under sections 2a and 2b of MIR.

Scoring matrix confirms site is best in Eaglesham for release:

Site is logical, sensible, obvious and sustainable addition to settlement envelope.

Site is close to bus terminus, community facilities and local footpaths

Nothing has changed with site between MIR and LDP

Site SG1.7 at Polnoon is more remote and distant. Site SG1.8 St Roddens Lane at 4 units would not provide affordable housing.

Eaglesham does not have the range and choice, size and type of opportunity seen elsewhere in the Plan and relies solely on one house builder.

Support overall ambition of the Plan but do not feel this has been applied to Eaglesham.

Contest scoring on Site Evaluation Matrix of -5:

Main issue effectiveness scoring of -6

Owners in active discussions with house builders. No ownership difficulty.

Physically no issues with site and no infrastructure issues

Education – the development of 24 houses will generate a maximum of 4 pupils for the primary school.

Effective site in terms of PAN 2/2010:

Ownership – owners willing to sell site to volume housebuilder and have been approached by several

Physical – development attractively set in landscape and defined by southern boundary

No contamination

No Deficit Funding required

No infrastructure constraints

Private house sole preferred land use

Consider -3 to be a fairer reflection of effectiveness scoring as per PAN 2/2010 and the site scoring to be -2 overall.

Assessment of Development Proposals

The site abuts the urban area and is close to facilities, within the 30 MPH zone.

A mix of housing will be incorporated including 6 affordable units.

It will result in a modest extension to the village and an opportunity for local people to relocate within the community.

4. It will not impact on the landscape character of, or setting of, the village or conservation area.

5. The site will not adversely impact on infrastructure.

6. Education capacity will not be an issue for a site of this size generating 4 new pupils. (This assumes we count 6 affordable houses which other LA's don't include in educational calculations).

7. The site will not create an adverse impact in terms of volumes on the existing roads infrastructure.

8. Impact on the greenbelt will be minimal as the site is a natural extension to the village.

9. – 15. These criteria will not be affected or are development control items which can be assessed at a later stage.

(e) Monitoring Statement

Support

Kenneth Wharton (Ref 75/5)

Appendix C Section 2.3.1 - Recommendations Eaglesham

Support ERD's recommendation that it is unsustainable to release any further sites in the rural settlement of Eaglesham.

Claire Wharton (Ref 419/9)

Appendix C Section 2.3.1 - Eaglesham

Support that it is unsustainable to release any further sites in Eaglesham

Modifications sought by those submitting representations:**(b) LDP34 Alnwick Drive****Scottish Water (Ref 662/1)**

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.
Removal of site from Green Belt.

(c) LDP40B Humbie Road**CALA Homes (West) and Paterson Partners (Ref 414/2)**

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.
Removal of site from Green Belt.
Overall score of -9 changed to -3.

(d) LDP78 Waukers Farm, Eaglesham**George Strang and Sons (Ref 60/1)**

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10 as private housing allocation for 24-40 units with 6 affordable units.
Removal of site from Green Belt

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

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council's approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

A number of new housing sites have been released in the Proposed Plan to meet housing needs in the Eastwood HMA, such as the SDO at Malletsheugh/Maidenhill and sites at Hillfield and Barcapel. No new sites have been proposed for Eaglesham.

A detailed analysis of the 4 rural settlements was undertaken (Appendix C of the Monitoring Statement refers) to inform the Plan. This study looked at a variety of factors including role and function, infrastructure, services and facilities, public transport, current consents and previous build rates to assess whether the rural settlements could accommodate further growth. For Eaglesham it was concluded no additional land should be released and the Polnoon development (SG1.17) for 128 units would provide appropriate levels of growth for the village.

(a) LDP29 Mid Borland Farm LDP30 East Glasgow Road**Support****Claire Wharton (Ref 419/10)**

Support for the Councils approach with the retention of the Green Belt designation at

these sites is noted and welcomed.

The site evaluation methodology was revised to address accessibility issues raised by SPT (CD/10). This has been applied consistently across all sites with the scoring changed accordingly. The Council does not agree that this places these sites at increased risk of development. The Development strategy as supported by the Rural Analysis does not support the release of additional sites in Eaglesham.

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

Objection

Elaine Shannon (Ref 947/2)

Green Belt issues and village character are addressed in the Rural Analysis included in the Monitoring Statement. As concluded no additional land releases were supported. In addition Strategic Policy 2: Assessment of Development Proposals and Policy D1: Detailed Guidance for AI Development provides the framework for assessing any applications that may come forward in terms of design and location.

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

(b) LDP34 Alnwick Drive

Objection

Scottish Water (Ref 662/1)

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG1 and Schedule 10.

This green field site lies to the south west of Eaglesham and was formerly used by Scottish Water. The site is bounded by Alnwick Drive, existing residential area and a reservoir. The Landscape Character Assessment (LCA) identifies the Green belt landscape character as being of weak-moderate value although the site does have an influence on the settlement character.

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 Plan and village to meet housing needs.

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.

As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.

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

(c) LDP40A and LDP40B Humbie Road

Claire Wharton (Ref 419/3), Standard Letter Comment SG10A (69 reps) (Ref 1004/1)

Support for the Councils approach with the retention of the Green Belt at these sites is noted and welcomed.

The site evaluation methodology was revised to address accessibility issues raised by SPT. This has been applied consistently across all sites with the scoring changed accordingly. The Council does not agree that this places these sites at increased risk of development. The Development strategy as supported by the Rural Analysis Exercise (Appendix C of the Monitoring Statement) does not support the release of additional sites in Eaglesham or Waterfoot.

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

LDP40B Humbie Road

Objection

CALA Homes (West) and Paterson Partners (Ref 414/2)

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG1 and Schedule 10.

This green field site is bounded by Kirktonmoor Road, residential area with open fields beyond. The LCA identifies the Green belt landscape character as being of moderate value. The site is particularly prominent to people travelling into Eaglesham along the main road corridors. 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. Development would represent a substantial intrusion into the Greenbelt and be visually intrusive and its release may expose wider areas of the Green belt to further development pressure.

It is recognised that the representation provides additional information on design, layout and mitigation planting. However, the development would be highly 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 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 Plan and village 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 not proposed to modify the Plan based upon the above

(d) LDP78 Waukers Farm, Eaglesham

Objection

George Strang and Sons (Ref 60/1)

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG1 and Schedule 10.

This green field site is bounded by Strathaven Road, existing residential area with open

fields beyond. The LCA identifies the Green belt landscape character as being of weak - moderate value. The site has an important influence on views in/out of Eaglesham.

It is recognised that the representation provides additional information to support the suitability of the site indicating that the hedgerow on the southern side would be retained as a new Green Belt edge. The proposal is for a small scale release of the Green belt.

The site was identified as a preferred site under Option 2B of the MIR (CD/03) but was removed following a review of the land supply and representations received for Green Belt development in Eaglesham.

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 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 Plan and village 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 not proposed to modify the Plan based upon the above.

(e) Monitoring Statement

Support

Kenneth Wharton (Ref 75/5), Claire Wharton (Ref 419/9)

Support for the Councils approach with the retention of the Green Belt boundary at Eaglesham as evidenced by Appendix C of the Monitoring Statement is noted and welcomed.

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

Reporter's conclusions:

Overview

1. The conclusions under Issues 2.1.1, 2.1.2 and 9.1 find that the overall vision and development strategy of the proposed plan is appropriate and that adequate housing land has been provided in line with the requirements set out in the Glasgow and the Clyde Valley Strategic Development Plan. The proposed plan provides considerably in excess of the strategic development plan requirement for private housing and adequate justification is provided for not meeting the affordable housing requirement. There is no numerical justification to allocate further sites for private housing.

LDP34 Alnwick Drive

2. This site on the southern edge of Eaglesham lies between Alnwick Drive and the embankment of Picketlaw Reservoir. It is below reservoir water level, and consists of rough grassland with bushes and small trees. It is separated from Alnwick Drive by a belt of trees of varying sizes, with gaps. There are houses along the opposite (north) side of

Alnwick Drive. The site has no particular landscape merits or recreational benefits, and is not widely visible, though it influences the outlook from houses on Alnwick Drive.

3. The proposed plan places the site within the green belt. I consider that the trees along Alnwick Drive provide a moderately strong green belt boundary, and that the site makes only a minor contribution to the setting and character of the village. Development for housing would move the green belt boundary to the reservoir embankment. If there were a shortage of housing land in Eaglesham or more generally in East Renfrewshire, and if there were evidence of effectiveness and of sufficient infrastructure capacity in Eaglesham, the site would be a credible candidate to be considered for development. Since there is no such shortage, however, the green belt status should be retained.

LDP40B Humbie Road

4. This site lies on the north-west side of Eaglesham and is situated within the green belt. It is rough grazing land with a fairly steep gradient from Humbie Road upwards to the south, rising by about 40 metres to the southern end. It is bounded by existing housing to the east and south, with mature trees along part of the western and south-western boundaries. It is highly visible from the north and west, and makes an important contribution to the landscape setting of Eaglesham. The landscape character is assessed as moderate-strong.

5. The representation proposes a development of about 86 houses. It argues that the existing green belt boundary of back gardens and hedgerows is weak, and the development by aligning with the tree belt further west would provide a stronger boundary. While I accept that argument, the stronger boundary 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. The loss of green belt land would in my view outweigh the boundary strengthening. The Monitoring Statement identifies limited infrastructure capacity in Eaglesham, which is unlikely to be able to accommodate additional housing on the scale proposed. The representation questions the scoring of the site in the council's Site Evaluation document, which resulted in a score of -9, and suggests that a higher score (-3) would have been more appropriate. However, I am satisfied that the council's site evaluation methodology is thorough and robust, and I see no reason to revisit the scores. I conclude that the site should be retained as green belt.

LDP78 Waukers Farm, Eaglesham

6. This site is on the south-east side of Eaglesham, bounded by Strathaven Road to the west, existing housing to the north, and agricultural land to the east and south. It is a grass field sloping gently down from the road, and there is a hedgerow along the southern boundary. It has a weak – moderate landscape character, and moving the green belt boundary to the southern and eastern edges of the field would not in my view significantly affect the setting of Eaglesham or undermine other green belt objectives. On the map, it 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.

7. The representation proposes a development of 24 houses including 6 affordable. If there were a shortage of housing land in Eaglesham or more generally in East Renfrewshire, and if there were evidence of effectiveness and of sufficient infrastructure capacity in Eaglesham, the site would be a credible candidate to be considered for

development. Since there is no such shortage, however, the green belt status should be retained.

Reporter's recommendations:

No modifications.

Issue 9.2.5	SUBMITTED HOUSING SUPPLY – NEWTON MEARNs	
Development plan reference:	Policy SG1: Housing Supply Policy SG2: Distribution of New Housing Schedule 10: Distribution, Capacity and Phasing of Additions to the Housing Land Supply	Reporter: Michael Cunliffe
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Philip C Smith (Ref 78/2) Bett Homes (Ref 138/1) Norman Graham (Ref 286/14) Taylor Wimpey (Ref 394/1) Stewart Milne Homes (Ref 500/2) Newton Mearns Community Council (Ref 686/2) Borders Eco Estates (Ref 751/1) Greenlaw Park Limited (Ref 775/3) Patterton SPV (Ref 776/2) D Jesner (Ref 783/12) (Ref 783/13) W Clifford (Ref 881/2) Ross Developments & Renewables Ltd (Ref 1025/1)</p>		
Provision of the development plan to which the issue relates:	<p>New Housing Development Locations: New Site Greenlaw (SG6.10 and SG6.20) LDP03 (Part) Humbie Road/Mearns Road LDP04 Humbie Road LDP08 and LDP10 Barrance Farm Sites LDP09 (Part) Humbie Bridge LDP25 (part) Patterton LDP28 Ryatt Farm New Site Red House site, between A77/M77 Site Evaluation</p>	
Planning authority's summary of the representation(s):		
<p><u>(a) New Site Greenlaw</u></p> <p><u>Objection</u></p> <p><u>Norman Graham (Ref 286/14)</u> No justification for land release strategy at Newton Mearns Next logical step Greenlaw business site as this would comply with SDP and not expand city region footprint Propose further new site adjacent to LDP27 be released for housing.</p> <p><u>Newton Mearns Community Council (Ref 686/2)</u> Release remainder of Greenlaw Business Park for housing. Accord with SDP. Close to railway and infrastructure in palce.</p>		

Greenlaw Park Limited (Ref 775/3)

Promotion of site for mixed-use housing development
 Brownfield site
 No interest in site for business use
 Site infrastructure in place
 Loss of site will not undermine employment land supply
 Site is effective
 Shortfall in housing supply

(b) LDP03 (Part) Humbie Road/Mearns Road**Objection****Taylor Wimpey (Ref 394/1)**

Objection to non-inclusion of site LDP03. Rep submitted for part of site (10 hectares)
 Site can be delivered more easily and quickly than other larger sites which may have multiple ownership issues or planning gain issues
 Site established variety and choice
 Application has previously been prepared and can be submitted quickly following plan adoption
 Site was not presented at MIR stage as it was subject to a planning application with a favourable recommendation subsequently refused
 Favourably considered by Planning Department previously
 Residential development established through 2012/0103/TP
 Site is appropriate in terms of assessment through policy SP2:
 Capacity 200 units, 25% affordable housing, mix of house types and sizes
 Will present a natural Green Belt boundary
 Developer contributions will be provided
 Will not impact on character or existing landscape due to existing residential properties adjacent to the site
 Impacts can be mitigated
 Can be integrated with existing transport network
 Proposed residential site is more sustainable than application site (2012/0107/TP)
 Scoring in Site Evaluation should be revised to reflect the smaller site (subject of this rep) as follows:
 Q3 site would not have significant impact on Green Belt, has no recreation or amenity value, and landscape enhancements proposed will provide robust defensible boundary with no coalescence, due to topography visual impacts minimal
 Q6 no national or local designations, SINC located to the south but not within the revised release area, any adverse impacts would be mitigated
 Q8 site is effective - in sole ownership of developer, no flood risk, SUDs investigated, 4 arm roundabout can reduce transport impact, no major infrastructure plans in vicinity, mitigation of any school capacity impact at time of application
 Rescoring of site from -12 to -5 and reflect revised site boundaries.

(c) LDP04 Humbie Road**Objection****Bett Homes (Ref 138/1)**

Objection to non-inclusion of site
 Logical and sustainable expansion

Adjacent to established residential areas, close to community and recreation facilities
 Capable of integration to existing and improved pedestrian and public transport, close to existing bus service Humbie Road
 Meets effectiveness criteria PAN2/2010
 Currently agricultural land propose low density development of 60 to 65 houses on 15 acre site, 10 acres to be developed
 4 bed and 5 bed houses 1200 sq ft to 2100 sq ft
 Affordable housing provided over and above this figure
 Anticipated planning gain/community benefits
 Reporter in 2003 inquiry concluded site as logical extension
 Site makes limited contribution to landscape, character and integrity of area would be maintained
 Access via new junction to Humbie Grove and Whitehill Grove
 Smaller housing development more achievable in current economic climate over masterplanned sites
 Site Evaluation Assessment- LDP04 Humbie Road, Newton Mearns
 Site is effective, site close to public transport
 Rescore of effectiveness, accessibility to public transport - rescore total to -3 Release from Green Belt

(d) LDP08 and LDP10 Barrance Farm Sites

Objection

Stewart Milne Homes (Ref 500/2)

Non-inclusion of Barrance Farm Sites, Waterfoot Road, Newton Mearns (LDP08 and LDP10)

Barrance Farm would form logical extension to Newton Mearns

Would establish a strong defensible Green Belt Boundary

Sites can be masterplanned and landscape mitigation provided

Will reinforce Green Belt boundary (LDP10)

Would bring new woodland planting and habitat enhancement

Existing bus service

Transport assessment in ERC Site Evaluation is more onerous than National Planning Policy

LDP08 - Site Evaluation should be amended - Accessibility to public transport from -3 to 1, total score from -8 to -4

LDP10 - Site Evaluation should be amended - Accessibility to public transport from -3 to 1, total score from -5 to -1

(e) LDP09 (Part) Humbie Bridge

Objection

W Clifford (Ref 881/2) - Promotion of small site for housing. 3 to 5 dwellings

(f) LDP25 Patterton

Objection

Patterton SPV (Ref 776/2)

Non-inclusion of site

Mixed-use residential site
 Site is effective
 Accessible location
 Can enable land for country park
 Development would be phased, phase 1 utilising or redeveloping existing buildings which would resolve site issues, phase 2 including a green corridor
 commercial/retail possible
 would introduce art work for entrance to country park
 Provide affordable housing self funded
 Have come to agreement with landowners over land required for country park and core path (link between country park and M77 bridge) - if site is allocated for housing
 If housing is allocated M77 bridge will allow pedestrians use, ungated at end, enable access to Waukmill Reservoir and will not be used for livestock
 Shortfall in housing supply
 Does not meet SDP target
 Phasing issues
 Over reliance on established housing supply
 Not all sites effective or still effective having been in plans for 5 years
 Include additional sites to meet shortfall

D Jesner (Ref 783/13) - Scored less-favourably in Site Evaluation

(g) LDP28 Ryatt Farm

Objection

Borders Eco Estates (Ref 751/1)

Promoting inclusion of site as part of M77 SDO in place of sites Maidenhill M2.1 and Lyoncross M2.2.

Ryat site:

Close to transport links

Would lead to link road J4/Barrhead

Close to facilities

Is previously developed land as opposed to 'virgin Greenfield'

Meets all objectives of LDP

Site Evaluation Assessment LDP28:

Q1 previously developed land, new score 1 (current score 0)

Q2 site has strong boundaries e.g. reservoir, 0 (-3)

Q3 positive impact from link road, - (-6)

Q4 within bus service range, 3 (-3)

Q5 proximity to Greenlaw local centre, 3 (-3)

Q6 no heritage assets, 1 (-3)

Q8 effective, 1 (-6)

Q10 2

Q11 no loss of employment as designation removed in LDP, 1 (0)

Overall score change to 13 from -23

Site Evaluation biased against site disproportionate to other sites

D Jesner (Ref 783/12)

Site Evaluation comments:

Ryatt site not in sole ownership, four different proprietors

Has descended three points since MIR

Ryatt site scored unfairly despite being in a particularly sustainable location with transport, services and facilities, has lowest score in Site Evaluation
 Better site than Maidenhill and scores do not compare
 Site Evaluation scoring for site Ryatt Farm LDP28 is biased based on personal feelings towards respondent
 Unexplained alterations to scoring system in Site Evaluation is a result of incompetent planners or wilful manipulation by officers politically motivated or with bias to favoured sites in the Plan
 Respondent has not made submission for his piece of land, which could be used for development, due to criticisms made against him
 Evidence to suggest planners are biased
 Planners have unhealthy relationship with developers

Ross Developments & Renewables Ltd (Ref 1025/1)

Non inclusion of site as SDO
 41.4 Ha site for mixed use development including:
 Public open space
 Public car park facilities
 Orientation/interpretation facilities
 Viewing platform
 WC facilities
 Visitor café
 Enhanced footpath connections to existing communities/local amenities
 Road network improvements
 Site for potential new primary school
 Hotel/Restaurant/Leisure complex
 Housing (350 homes)

(h) New Site Red House site, between A77/M77

Objection

Philip C Smith (Ref 78/2)

Propose new site at Red House between M77 and A77 for approx 4 houses in light of comments on policy D3
 Landlocked site from agricultural perspective.

Modifications sought by those submitting representations:

(a) New Site Greenlaw

Norman Graham (Ref 286/14), Newton Mearns Community Council (Ref 686/2)

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

Greenlaw Park Limited (Ref 775/3)

Inclusion of the site as a residential-led mixed use development opportunity under Policy SG2 and Schedule 10.

Delete the Safeguarded Business and Employment Area (Site Ref: SG6.10) and Business Proposal (Site Ref: SG6.20) allocations currently affecting the Greenlaw Business Park site. Modify Schedules 12 and 13 to reflect this.

(b) LDP03 (Part) Humbie Road/Mearns Road**Taylor Wimpey (Ref 394/1)**

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.
Removal of site from Green Belt.

(c) LDP04 Humbie Road**Bett Homes (Ref 138/1)**

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.
Removal of site from Green Belt.

(d) LDP08 and LDP10 Barrance Farm Sites**Stewart Milne Homes (Ref 500/2)**

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.
Removal of site from Green Belt.

(e) LDP09 (Part) Humbie Bridge**W Clifford (Ref 881/2)**

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.
Removal of site from Green Belt.

(f) LDP25 Patterton**Patterton SPV (Ref 776/2)**

Inclusion of the site as a mixed-use site under Policy SG2 and Schedule 10.
Removal of site from Green Belt.
Include site within Policy M2: M77 Strategic Development Opportunity.

D Jesner (Ref 783/13) - Site Evaluation scoring should be reviewed.

(g) LDP28 Ryatt Farm**Borders Eco Estates (Ref 751/1)**

Inclusion of the site as a mixed-use site under Policy SG2 and Schedule 10.
Removal of site from Green Belt.
Include site within Policy M2: M77 Strategic Development Opportunity.
Remove designations under D4: Green Network and D10: Environmental Projects
Delete sites M2.1Maidenhill and M2.2 Lyoncross.

D Jesner (Ref 783/12) - Site Evaluation scoring should be reviewed.

Ross Developments & Renewables Ltd (Ref 1025/1)

Inclusion of the site as a mixed-use site under Policy SG2 and Schedule 10.
Removal of site from Green Belt.
Include site within Policy M2: M77 Strategic Development Opportunity.

(h) Site Red House site, between A77/M77**Philip C Smith (Ref 78/2)**

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.
Removal of site from Green Belt.

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

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council's approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

A number of new housing sites have been released in the Proposed Plan to meet housing needs in the Eastwood HMA, such as the SDO at Malletsheugh/Maidenhill and sites at Hillfield and Barcapel.

(a) New Site Greenlaw**Objection****Norman Graham (Ref 286/14), Newton Mearns Community Council (Ref 686/2), Greenlaw Park Limited (Ref 775/3)**

Objections were received regarding the non inclusion of the site as a preferred housing site or for mixed use under Policy SG2 and Schedule 10 and the deletion of the economic designation under Policy SG6 and Schedules 12 and 13.

This is a Greenfield serviced site located within the Greenlaw Urban Expansion Area. The site is allocated for economic development under Policies SG6.10 and SG6.20 and the representation is seeking a mixed use residential led development opportunity. The Council recognises that demand for this site has been limited; however, this site forms an important element of the effective marketable business land supply and should be retained for economic development. This is important to ensure that a range of effective employment opportunities are provided across the Council area. The economic importance of this site is addressed further under Issue 11: Economic Development. An adjacent site now designated SG2.5 was formerly allocated for employment development, however, residential development was granted on appeal (PPA/220/2010) for 158 units December 2012 (CD/101). The loss of this land means the retention of this site becomes more important.

It is recommended that this site continues to be allocated for economic development. Other sites have been identified in the Plan to meet housing needs. The Council is not aware of any active house builder interest in the site.

As there is no requirement to release additional sites for housing and given the sites economic importance the site has been rejected for inclusion as a housing or mixed use proposal and should be retained for economic development uses.

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

(b) LDP03 (Part) Humbie Road/Mearns Road

Objection

Taylor Wimpey (Ref 394/1)

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

This green field site lies to the South of Newton Mearns and is bounded by Mearns Road and Humbie Road. The Landscape Character Assessment (LCA) (CD/45) indentifies the Green Belt landscape character as being of moderate – strong value. The development would result in a significant intrusion into the Green Belt. The site makes a positive contribution to this part of the Green Belt. The site acts as a strong green gateway into/out of the Newton Mearns. 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 the south to development pressure.

It is recognised that the submitted supporting information aims to address issues of landscape impact and design. The representation promotes a smaller area of land than assessed in the site evaluation although the proposed unit numbers are greater.

It is accepted that a house builder is actively involved with the site. The representation also states that the site is effective and deliverable.

A previous smaller application (2012/0107/TP) (CD/97) for 85 houses was refused by the Council June 2013.

The site given its location is not supported by the Proposed Plan. It is recommended that this site continues to be allocated as Greenbelt. Other more sustainable sites have been identified in the Plan to meet housing needs. In addition, given the scale (200 units) and location it could undermine the progress of the Development Strategy and delivery of the key master plan at Malletshuegh/Maidenhill Newton Mearns.

As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.

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

(c) LDP04 Humbie Road

Objection

Bett Homes (Ref 138/1)

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

This green field site lies to the South of Newton Mearns and is bounded by Humbie Road an existing residential estate and cemetery to the north with open views in all other directions. Humbie Road and the cemetery establish a strong Green Belt boundary. The LCA identifies the Green Belt landscape character as being of moderate – strong value. The site makes a positive contribution to this part of the Green Belt. The site acts as a strong green gateway into/out of the Newton Mearns. 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 the south and east to development pressure.

It is recognised that the submitted supporting information aims to address issues of landscape impact and design.

It is accepted that a house builder is actively involved with the site. The representation also states that the site is effective and deliverable.

The 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 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 not proposed to modify the Plan based upon the above.

(d) LDP08 and LDP10 Barrance Farm Sites

Objection

Stewart Milne Homes (Ref 500/2) - An objection was received regarding the non inclusion of these sites as preferred housing sites under Policy SG2 and Schedule 10.

The two sites are located to the south eastern edge of Newton Mearns and are both green field sites used for grazing animals.

LDP08 is a green field site bounded by an allocated housing site/associated open space (SG1.30) and the former Barrance Farm steading to the north (currently under construction for 13 units SG1.28) with open fields beyond and golf academy/course to the west. A right of way runs along the northern boundary.

LDP 10 is a green field site bounded to the west by an established residential area with open views to the north and east and a golf academy/course to the south with a right of way/track running along the eastern boundary.

The Landscape Character Assessment for the two sites at Barrance Farm concludes that, "The area plays an important role in maintaining settlement separation and contributing to undeveloped corridors between settlements." The LCA identifies the Green Belt landscape character as being of moderate – strong value. However, whilst site LDP08 is contained within well defined boundaries it would still result in a physical and visual intrusion into the Green Belt, particularly as the adjacent housing proposal is not yet constructed. Kirkhill Road establishes a strong Green Belt boundary for site LDP10; however, it is less clearly defined where it follows rear gardens. Development may help to create a stronger boundary.

Both sites make a positive contribution to this part of the Green Belt. Development would reduce the current rural quality and feel of the area.

The site evaluation methodology was revised to address accessibility issues raised by SPT (CD/10). This has been applied consistently across all sites with the scoring changed accordingly. SPT raised particular concerns regarding the public transport accessibility of these two sites.

It is recognised that the submitted supporting information aims to address issues of landscape impact and design. Woodland planting and keeping development below the skyline are proposed.

It is accepted that a house builder is actively involved with the site. The representation also states that the site is effective and deliverable.

The Council recognises the merits of these sites and that development could form a logical future extension to the urban area. However, it is recommended that the sites continue to be allocated as Green Belt. Other sites have been identified in the Plan to meet housing needs.

As there is no requirement to release additional sites the sites have been rejected for inclusion as housing proposals.

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

(e) LDP09 (Part) Humbie Bridge

Objection

W Clifford (Ref 881/2) - An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

This small Greenfield site is bounded by Humbie Road to the east with farmland to the south. Earn Water runs along the northern and eastern boundaries. The site is entirely detached from the main urban area. The LCA identifies the Green Belt landscape character as being of moderate – strong value. This area of green belt acts as a strong green gateway into/out of the Newton Mearns. 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.

It is recommended that this site continues to be allocated as Green Belt. 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. Strategic Policy 2: Assessment of Development Proposals and Policy D3: Green belt and Countryside Around Towns and its supporting SPG provide the policy framework to consider any future applications for development.

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

(f) LDP25 Patterton**Objection**

Patterton SPV (Ref 776/2), D Jesner (Ref 783/13) - Objections were received regarding the non inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10 and to the site evaluation. Mr Jesner queried the site evaluation scoring for the site.

This green field site lies to the North West of Newton Mearns and is bounded by the railwayline, M77 and Stewarton Road. The site falls within two LCA character areas however both are identified as being of moderate – strong value.

Due to the topography of the site development may be visible from the surrounding areas. This is an extensive, undulating and prominent green belt site. The scale of development proposed would result in a significant intrusion into the Green Belt and reduction in the gap between Glasgow and Newton Mearns. The site makes a positive contribution to this part of the Green Belt and to the containment of Newton Mearns. Development of this site would be visually prominent and remove a significant green wedge and corridor.

It is recognised that the submitted supporting information aims to address issues of landscape impact and design. The site is viewed as an accessible location due to its proximity to Patterton railway station. The representation also promotes some commercial development opportunities and allows for pedestrian access to the Dams to Darnley Country Park. This remains a key aspiration for the Council to improve public access from the Newton Mearns side of the Park.

A further response was submitted during consultation to the Modifications stage stating that part of the site could be suitable as an alternative location for a religious/community facility, albeit dependent on the release of the whole site for a mixed use proposal. Further to this submission an additional statement was received indicating that the proposal could not currently be delivered but development of the site for a mixed use scheme including provision of a religious/community facility remained a future option.

The Site Evaluation assessed a larger site than the one proposed under this representation. However, it is viewed that the assessment of the site and its conclusions remain accurate and fair.

The representation states that negotiations are ongoing with developers keen to take forward the site. However, the Council is unaware of any house builder that is actively involved with the site. The effectiveness and deliverability has therefore not been fully demonstrated.

The 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 Plan to meet housing needs. In addition, given the scale (250 units) and location it could undermine the progress of the Development Strategy and delivery of the key master plan at Maidenhill/Malletshuegh Newton Mearns.

As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal.

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

(g) LDP28 Ryatt Farm**Objection****Borders Eco Estates (Ref 751/1), D Jesner (Ref 783/12), Ross Developments & Renewables Ltd (Ref 1025/1)**

A number of objections were received regarding the non inclusion of land around Ryatt Farm and Ryatt Linn for mixed use developments under Policy M2, Policy SG2 and Schedule 10.

The Mackay Planning representation seeks a residential or mixed use development comprising approximately 250-300 units. The response from Mr Jesner advocates the suitability of land surrounding Ryatt Farm for development although no firm proposal was submitted. Mr Jesner queried the site evaluation scoring for the site and land ownership issues stating there are 4 owners rather than 1. The representation from Holder Planning seeks a larger mixed proposal for approximately 350 units including leisure and commercial facilities and includes an area of land to the west of Ryatt Linn reservoir. These green field sites are bounded to the east by the M77, Ryatt Linn reservoir to the west and West Lodge Woods to the South. The LCA identifies the Green belt landscape character as being of moderate – strong value. 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 LCA reveals “This character area has a distinctive landscape character derived from the combination of landform and the presence of reservoirs and associated structures. It is visually contained and provides an important gap between Barrhead and Newton Mearns. Development within and encroaching onto the edges of this area would undermine these qualities and roles”.

The site makes a positive contribution to this part of the Green Belt. Development would remove a significant green wedge 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.

It is recognised that the submitted supporting information aims to address issues of landscape impact and design. However, major development would be likely to undermine the value of this area of the green belt.

Policy M2 identifies land subject to a master planned approach. Two large sites Malletsheugh /Maidenhill (M2.1) and Barrhead South (M2.2) are subject to a phased master planned approach to delivery. Further key proposals are improving connectivity between Barrhead and Newton Mearns through key road proposals including the ‘Balgray Link’ Road and upgrades to Aurs Road. A new rail halt is also proposed for Barrhead South.

It was stated that development would allow the Council to implement improvements to Junction 4. However, at the previous Local Plan Examination 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 has now been deleted from the Plan with other upgrades to the road network promoted. Policy SG10.12 relates to potential longer term enhancement.

The proposed sites lie within the Dams to Darnley Country Park as referred to under Policy D10. 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. It is anticipated that a Draft SPG covering these issues will be consulted upon summer/Autumn 2014.

Connectivity and Country Park enhancements are addressed within the Development frameworks for the master plan areas. The scale of development proposed by these representations would undermine these proposals and the Development Strategy of the Plan.

It is viewed that the assessment of the site in the Site Evaluation was based upon accurate and known information and undertaken in a fair and consistent manner. The Council sought clarity on ownership at Ryatt Farm from Mr Jesner, reply attached to representation email correspondence dated 12th March 2014).

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. There is no suggestion or support that is land is therefore otherwise appropriate for development if no user of national importance is forthcoming.

The effectiveness and deliverability of these sites has not been demonstrated and the Council is not aware of any active house builder interest in the sites. The Mackay representation refers to Borders Eco Estates as the developer, however, the Council is unaware of this company and no additional information has been supplied. The Council has sought clarification on this point but no reply was received from the representee (email correspondence 13th March 2014).

The 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 Plan to meet housing and other community and commercial needs. In addition, given the scale (upto approximately 350 units) and location it could undermine the progress of the Development Strategy and delivery of the key master plans at Malletshuegh/Maidenhill Newton Mearns and Barrhead South.

As there is no requirement to release additional sites the sites have been rejected for inclusion as a housing or mixed use proposal.

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

(h) New Site Red House site, between A77/M77

Objection

Philip C Smith (Ref 78/2)

This small Greenfield site is bounded by the M77 and the A77. The site is entirely detached from the main urban area. The LCA identifies the Green belt landscape character as being of weak -moderate value. The site is clearly outside and not well

related to the built form of Newton Mearns resulting in an isolated development. It is recommended that this site continues to be allocated as Green Belt. Other more sustainable sites have been identified in the Plan to meet housing needs.

Strategic Policy 2: Assessment of Development Proposals and Policy D3: Green belt and Countryside Around Towns and its supporting SPG provide the policy framework to consider any future applications for development at this location. The appropriateness of Policy D3 is addressed further under Issue 4. It is not proposed to modify this policy.

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

Reporter's conclusions:

Overview

1. The conclusions under Issues 2.1.1, 2.1.2 and 9.1 find that the overall vision and development strategy of the proposed plan is appropriate and that adequate housing land has been provided in line with the requirements set out in the Glasgow and the Clyde Valley Strategic Development Plan. The proposed plan provides considerably in excess of the strategic development plan requirement for private housing and adequate justification is provided for not meeting the affordable housing requirement. There is no numerical justification to allocate further sites for private housing.

New Site Greenlaw

2. Despite being a fully-serviced site for business and employment use, and being actively marketed for over 10 years, the area remains undeveloped with the rather unkempt appearance of an urban brownfield site. Together with the retail site (SG8.6) on the other side of Crookfur Road, it provides a somewhat dispiriting gateway to Newton Mearns for travellers arriving from the M77 at Junction 4. The site is the remnant of a larger area allocated in the local plan for business development as part of the Greenlaw Expansion Area, the rest having been granted planning permission for housing on appeal in 2012. One of the reasons the 2012 appeal was allowed was because the potential remained to develop this adjacent site for business floorspace and to still provide a sustainable "community" development where people could live, work and shop.

3. The representations list a number of reasons why this site has proved unattractive for business development. Greenlaw does not benefit from any specific locational advantages. It is not within an Enterprise Zone, adjacent to an airport or within an urban regeneration area. There is no funding available for speculative office development, and no Regional Selective Assistance available for major companies coming into the Greenlaw area. There are high levels of supply of business/employment land across the West of Scotland.

4. The council argues that there needs to be a range and choice of marketable sites and locations for businesses, and that this site is within close proximity to a motorway connection and has major infrastructure in place. The site is considered an important element of the effective marketable business land supply and is identified in the Monitoring Statement as the only "quality" site in East Renfrewshire. While there is currently little evidence of a local market for such land, and Appendix H2 of the Monitoring Statement notes that East Renfrewshire has a 28-year supply of business development land at recent take-up rates, I acknowledge that it is possible that the

market could improve and that this well-positioned and serviced site could yet attract interest.

5. In addition, the proposed plan provides sufficient housing land elsewhere, and there is currently no need to release any of this site for housing development. In the event that the situation changed and additional housing was required while demand for business development remained depressed, an application to develop the site for housing or mixed use could be considered under Policy SG6. In the meantime, the site should continue to be allocated for business and employment use.

LDP03 (Part) Humbie Road/Mearns Road

6. This site is on the southern fringe of Newton Mearns and is bounded by Mearns Road and Humbie Road. It consists of undulating farmland with hedgerows and a significant number of mature trees. It has a distinctly rural appearance and makes an important contribution to the landscape setting of Newton Mearns. The council's Landscape Character Assessment identifies the landscape character as being of moderate – strong value. Development of this site would result in a significant intrusion into the green belt. I acknowledge that the developer proposes landscape enhancements that would provide a robust and defensible green belt boundary. However, I consider that the existing boundary provided by Humbie Road and Mearns Road is even more robust, and should be retained.

7. The representation questions the scoring of the site in the council's Site Evaluation document, which resulted in a score of -12, and suggests that a score of -5 would have been more appropriate. However, I am satisfied that the council's site evaluation methodology is thorough and robust, and I see no reason to revisit the scores. With a capacity of about 200 houses, development of this site would undermine the strategy of the proposed plan that concentrates new housing on brownfield and strategic sites. It would constitute an unnecessary expansion of Newton Mearns into the countryside, which would not in my view be justified.

LDP04 Humbie Road

8. This site is on undulating grassland to the south-east of Newton Mearns. It is bounded to the south by Humbie Road, to the east by a hedgerow and a line of trees, to the north by Waterfoot Road and by Mearns Cemetery, which is enclosed by a wall, and to the west by Whitehill Grove and the back gardens of houses. While the Landscape Character Assessment identifies the green belt landscape character as being of moderate – strong value, it is compromised by an overhead power line and I consider it less strong than that of site LDP03. The existing green belt boundary is fairly robust, but the boundary after development would be too, with trees defining the eastern edge of the site, the existing buildings at Burnhouse the north-east edge and Humbie Road the southern edge.

9. Development of 60-65 units is proposed. While the site does make a positive contribution to the green belt, its loss would not in my view represent a major intrusion or (if sensitively developed) cause significant damage to the landscape. There is evidence of effectiveness. If there were a shortage of housing land in this part of East Renfrewshire, this site would merit consideration for release. However, the proposed plan makes sufficient provision elsewhere. In these circumstances, the arguments for retention as part of the green belt outweigh those favouring development.

LDP08 and LDP10 Barrance Farm Sites

10. These two sites are located on the south-east side of Newton Mearns in the green belt. LDP08 is the slightly smaller of the two and lies to the north of Waterfoot Road. To the north-west is the Barron's Wood residential development (SG1.30), to the north a small park area and a small housing development already built at Barrance Farm, and to the east is Kirkhill Road with the car park and buildings of Mearns Castle Golf Academy on the other side. The site is an undulating grass field with an open aspect to the south. It forms part of a green gateway into Newton Mearns, though the rural character is compromised by the golf academy development.

11. The Landscape Character Assessment identifies site LDP08 as having a landscape character of moderate-strong value. The site is contained within well defined boundaries, and Waterfoot Road would provide a strong boundary to the green belt if the site were developed. There would not be a significant reduction in the separation between Newton Mearns and Waterfoot. Development, if carried out sensitively, would not be out of character with the surrounding residential and recreational uses. The site could be seen as a logical extension of Newton Mearns, if there were a need to find additional sites for private housing.

12. Site LDP10 is an undulating grass field which lies to the north of Kirkhill Road, bounded to the west by the rear gardens of houses off Laigh Road, to the south-east by the golf course, and to the north-east by fields. There are belts of trees along the southern and south-eastern boundaries, some groups of trees on the western side, and hedgerows on the other boundaries and across the middle of the field. Again, it is identified as having a moderate-strong landscape character. It is a less open site than LDP08 and visibility is largely limited to the views from houses on the west side and glimpses from High Flenders Road which lies across the fields to the north-east. The gardens of the houses to the west provide a stronger green belt boundary than the representation suggests, since the line is reinforced by trees.

13. The area has a stronger rural feel than site LDP08, and also has a more prominent role in maintaining a green corridor between settlements, in this case between Newton Mearns and Busby/Clarkston. Measured between the existing Laigh Road housing and Williamwood High School, the width of the green corridor would be reduced by about a quarter. This would represent a significant intrusion into green belt land. I therefore consider site LDP10 less favourably than LDP08.

14. In both cases, there is evidence of effectiveness. The representation questions the scoring of the sites in the council's Site Evaluation document, which resulted in scores of -8 and -5 for LDP08 and LDP10 respectively, and suggests that scores of -4 and -1 would have been more appropriate. However, I am satisfied that the council's site evaluation methodology is thorough and robust, and I see no reason to revisit the scores. Given that the proposed plan has provided adequate housing land elsewhere in this part of East Renfrewshire, I conclude that both sites should remain in the green belt.

LDP09 (Part) Humbie Bridge

15. This small isolated site lies in the countryside about 600 metres south-east of the built-up area of Newton Mearns. The site is bounded by Humbie Road to the north-east and by farmland to the south-east, and the Earn Water runs along the north-western and south-western boundaries. Just north-west of the site, the road crosses the narrow

Humbie Bridge and follows a sharp double bend towards Newton Mearns. The site adjoins an existing house on Humbie Road, in a pleasant rural setting. There is another house on the opposite side of the road, and a cattery along a track to the south-west. The Landscape Character Assessment identifies the green belt landscape character as being of moderate-strong value. Development for 3-5 houses is proposed. The site is well detached from the urban area, and development would represent an unnecessary intrusion into the rural setting which would negatively affect the landscape character. The site should therefore retain its green belt designation.

LDP25 Patterton

16. This large site lies on the north-west side of Newton Mearns. It is bounded to the west by the M77, to the south by a railway line, to the east by Stewarton Road (with Patterton Station on the opposite side) and to the north by farmland beyond which lies, at a distance of less than 200 metres, the built-up area of Glasgow. The site comprises undulating pasture and includes the buildings of Patterton Steading, for which planning permission has been granted for residential development. A farm overbridge links the steading to land on the west side of the M77, which forms part of Dams to Darnley Country Park.

17. The Landscape Character Assessment identifies site LDP25 as having a landscape character of moderate-strong value, though scenically it is compromised by the motorway, the railway and the car park in the north-east corner. The railway line provides a strong green belt boundary to the north of Newton Mearns. Development of the site, even with tree planting, would provide a weaker boundary. It would also reduce the separation between the built-up areas of Newton Mearns and Glasgow in the area west of Stewarton Road from around 600 metres to less than 200 metres. This would be a significant intrusion into the green belt and would adversely affect the setting of Newton Mearns.

18. The representations propose a mixed-use development including about 250 houses and, potentially, provision of a religious/community facility. The site was identified for possible development in the M77 Corridor Masterplan study (2011). It is located close to Patterton Station and scores well for sustainable transport. The site also has potential to play a role in opening up access to Dams to Darnley country park by changing the overbridge from agricultural to recreational use. However, I have not seen evidence of housebuilder interest so effectiveness is in doubt. The site had a score of -8 in the council's site evaluation study. I am satisfied that the council's methodology is thorough and robust, and I see no reason to revisit the scores. In my view the site's advantages are outweighed by the adverse effects on the green belt, and the risk that 250 houses in this location could pose to the realisation of the proposed plan's strategy of concentrating new housing development on designated strategic sites. The land should therefore remain part of the green belt.

LDP28 Ryat Farm

19. This site (I have adopted the spelling with one 't' as on the Ordnance Survey map) lies in the green corridor separating Newton Mearns from Barrhead. It is bounded by the M77 to the east, the Glasgow-Neilston railway line to the north, Ryat Linn reservoir and Aurs Road to the west, and the woods surrounding Pollock Castle House to the south. It is part of a visually contained area, defined to the east by the motorway and to the north by the railway which is partly on viaduct. It is rural in character but strongly influenced by

past development, notably the water supply reservoirs of Ryat Linn and Balgray. The site is mostly rough grassland, and parts consist of made-up land on the sites of former waterworks and quarries. It contains a number of trees, notably on the south-east edge of Ryat Linn Reservoir.

20. The council states that the site forms part of the Dams to Darnley Country Park, though this is disputed by Mr Jesner in his representation (Ref 783/12). While the site does not itself appear to be readily accessible to the public, it strongly influences the landscape within the park and the view from the public path on the opposite side of Ryat Linn Reservoir. The Landscape Character Assessment identifies site LDP28 as having a landscape character of moderate-strong value. Any housing development on the site, however sensitively landscaped, would profoundly alter the setting of the reservoir from its present rural character to one of 'leafy suburbia'. It would substantially narrow the green corridor between Newton Mearns and Barrhead. At present this is about 1.8 kilometres across the site, but would be reduced to about 1.2 kilometres by the proposed Barrhead South strategic development area. Development at Ryat Farm would further reduce the gap to about 700 metres, less than half what it is at present. While Barrhead South would remain to the north of the railway line, Ryat Farm would encroach into the reservoir-dominated landscape at the heart of the country park.

21. Against this, the representations favouring mixed-use development on the site with up to 350 houses propose to open up access to the country park and provide visitor facilities. There would be some attractions in this, since access at present is not easy and facilities are lacking. A road link is proposed from Junction 4 on the M77 across the southern part of the site to Aurs Road. However, these benefits would be secured at a high price in terms of green belt loss and landscape and visual intrusion. I acknowledge that the principle of development on the site for high-amenity business use has been accepted in the past, but in that case the loss of rural character would have been offset by employment benefits. The current proposals being promoted in the representations could include some employment-generating leisure facilities, but on a much smaller scale, and the predominant land use would be housing.

22. The representations challenge the council's site evaluation process and claim that the scores assigned to Ryat Farm were unfair. I am satisfied that the council's methodology is thorough and robust, but in view of the site's very low score (-23) and the claims made in representations, I have looked again at the scores. On Q1, land use type, I agree the council's score of 0 since this is a greenfield site (whatever the history of some parts of it). On Q2, location, -3 is appropriate since the site lies wholly within the green belt, separated from Newton Mearns by the M77. On Q3, impact of development, I agree the council's score of -6 since in my view there would be a damaging impact on rural landscape character and a significant reduction in the width of the green belt. On Q4, accessibility to public transport, I have not rigorously checked walking distances or bus frequencies, but giving the benefit of the doubt there could be a score of 2 on bus accessibility. The site would not be within 800 metres' walk of Patterson Station unless a new path over or under the M77 from the northern part of the site was formed.

23. On Q5, accessibility to services and facilities, some at least appear to be within the specified distances and a score of 0 (rather than -3) would be appropriate. As regards natural and built heritage (Q6 and Q7) neutral scores of 0 would be appropriate. On Q8, effectiveness, the site appears free of major constraints but there is no evidence of housebuilder involvement. A score of -3, rather than the council's -6, might be justified. On Q9, there is no indication of more than the normal percentage of affordable housing,

so a score of 0 is appropriate. On Q10, other community benefits, I concede that the development could have some benefit in improving access to the country park, so a score of 1 (moderate enhancement) could be merited. A score of 1 for economic benefit appears to me correct. Adding up these alternative scores gives a total of -8, placing the site in the middle of the table of other green belt sites that failed to make the cut. I conclude that, even with a generous approach to evaluation, the negative impacts of the Ryat Farm site would substantially exceed the benefits of development, and the site should remain as green belt.

Red House site, between A77/M77

24. This small site lies well to the south of the built-up area of Newton Mearns on a wedge of land between the M77 and A77. The site, covered by long grass and shrubs, is elevated above the level of the A77 and could prove difficult to develop, particularly in respect of safe vehicular access. It is right against the motorway embankment and exposed to traffic noise. The landscape character is not of high value, and a power line crosses the site. Development here, while not likely to damage the character of the green belt, would result in an isolated cluster of houses in a less than ideal environment. The general thrust of planning policy does not favour such developments, and I see no justification for an exception here. The site should therefore remain as green belt.

Reporter's recommendations:

No modifications.

Issue 9.2.6	SUBMITTED HOUSING SUPPLY UPLAWMOOR	
Development plan reference:	Policy SG1: Housing Supply Policy SG2: Distribution of New Housing Schedule 10: Distribution, Capacity and Phasing of Additions to the Housing Land Supply	Reporter: Katrina Rice
Body or person(s) submitting a representation raising the issue (including reference number):		
Mactaggart and Mickel Homes Limited (Ref 703/11) Bob Smith (Ref 784/1)		
Provision of the development plan to which the issue relates:	New Housing Development Locations: LDP73 Land at Uplawmoor West LDP74 Libo Avenue	
Planning authority's summary of the representation(s):		
<p><u>(a) LDP73 Land at Uplawmoor West</u></p> <p><u>Objection</u></p> <p><u>Mactaggart and Mickel Homes Limited (Ref 703/11)</u> Non-inclusion of site: LDP73 Land at Uplawmoor West Promoting land for housing allocation Site reappraised in representation.</p> <p><u>(b) LDP74 Libo Avenue</u></p> <p><u>Objection</u></p> <p><u>Bob Smith (Ref 784/1)</u> Object to non-inclusion of site 1-3 units No adverse impact on TPO Natural extension to Libo Avenue Site can be developed without undermining the Green Belt Will not lead to loss of character/amenity Improvements to Green Network Housing in proximity is in Green Belt Access from Libo Avenue Sits within defensible boundaries will not set precedent Has sustainable transport links, close to primary school 3 acres of development, 7 acres gifted as local woodland nature park</p>		
Modifications sought by those submitting representations:		
<p><u>a) LDP73 Land at Uplawmoor West</u></p> <p><u>Mactaggart and Mickel Homes Limited (Ref 703/11)</u> Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10 – 25</p>		

units.

Removal of site from Policy D5: Urban Green space.

(b) LDP74 Libo Avenue

Bob Smith (Ref 784/1)

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

Removal of site from Green Belt.

Summary of responses (including reasons) by planning authority:

OVERVIEW

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council's approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

A number of new housing sites have been released in the Proposed Plan to meet housing needs in the Levern Valley HMA. No new sites have been proposed for Uplawmoor.

A detailed analysis of the 4 rural settlements was undertaken (Appendix C of the Monitoring Statement refers) to inform the Plan. This study looked at a variety of factors including role and function, infrastructure, services and facilities, public transport, current consents and previous build rates to assess whether the rural settlements could accommodate further growth. For Uplawmoor it was concluded no additional land should be released and the sites at Uplawmoor East (SG1.43) for 39 units and Pollick Avenue (SG1.42) for 9 units would provide appropriate levels of growth for the village.

(a) LDP73 Land at Uplawmoor West

Objection

Mactaggart and Mickel Homes Limited (Ref 703/11)

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

This is a Greenfield site within the village and is currently designated as protected urban greenspace under Policy D5 and Policy D8: Natural Features as 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.

A previous planning application (2003/0683/TP) was refused and the decision upheld through appeal (PPA/220/75) (CD/99).

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 Council does not wish to see this green resource lost to development. The site performs a strong

recreational role with an informal network of paths running through the site and provides a positive contribution to the green network within Uplawmoor. Development may adversely impact upon the integrity of this area of open space. Other more sustainable sites have been identified in the Plan and village to meet housing needs.

Development would result in the loss of mature trees and affect bio-diversity and ecology. The representation states that mitigation measures would ensure that mature trees will not be affected and the site is overgrown and unmanaged.

It is accepted that a house builder is actively involved with the site. The representation also states that the site is effective and deliverable.

There is no requirement to release this land as an additional housing site and no justification for the loss of this area of important urban green space. Strategic Policy 2: Assessment of Development Proposals provides the policy framework to consider any future applications for development.

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

(b) LDP74 Libo Avenue

Objection

Bob Smith (Ref 784/1)

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

The site is located to the northern fringe of Uplawmoor and comprises woodland and grassland. It is bounded by Lochlibo Road, existing residential area with Uplawmoor and Shillford Woods beyond.

The Landscape Character Assessment (LCA) identifies the Green belt landscape character as being of weak - moderate value. Protection of the environmental features of the site is provided by Policy D8. The TPO provides important environmental protection for the trees and the Local Biodiversity and nature conservation value. The Council does not wish to see this green resource lost to development. The site performs a strong recreational role with an informal network of paths running through the site and provides a positive contribution to the green network within Uplawmoor. Development may adversely impact upon the integrity of this area of Green Belt. The site has an important influence on the settlement form of Uplawmoor.

It is recognised that the representation does state that only part of the site would be used for a low density development with the remainder retained as community woodland. However, other more sustainable sites have been identified in the Plan and village to meet housing needs.

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.

As there is no requirement to release additional sites the site has been rejected for inclusion as a housing proposal. Strategic Policy 2: Assessment of Development Proposals and Policy D3: Green belt and Countryside Around Towns and its supporting

SPG provide the policy framework to consider any future applications for development.

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

Reporter's conclusions:

Overview

1. The conclusions under Issues 2.1.1, 2.1.2 and 9.1 find that the overall vision and development strategy of the proposed plan is appropriate and that adequate housing land has been provided in line with the requirements set out in the Glasgow and the Clyde Valley Strategic Development Plan. The proposed plan provides considerably in excess of the strategic development plan requirement for private housing and adequate justification is provided for not meeting the affordable housing requirement. There is no numerical justification to allocate further sites for private housing.

LDP73 Land at Uplawmoor West

2. This green field site is located to the south of Uplawmoor behind housing on Tannoch Road and Neilston Road and to the north of the Pollick Glen Local Biodiversity Site. It is identified in the proposed plan as protected urban greenspace and a Tree Preservation Area and as a priority space for taking forward under the communities theme in the council's Green Space Strategy 2008-2012. The site is overgrown in nature with areas of shrubs, hedges, young and mature trees and tall grasses. Part of the site to the east is fenced off but the fence is broken down in places. A network of well-used informal pathways cross the site towards the core path, mature woodland and burn along Pollick Glen. I agree that the site plays a recreational role and connects the village to the green network of Pollick Glen. Planning Advice Note 65 on planning and open space is clear that all spaces (public and private), regardless of ownership and accessibility contribute to the amenity and character of an area (paragraph 18). I consider that the site is an important open space which could be enhanced and warrants its designation as protected urban greenspace. Its development would have an unacceptable, adverse impact on the character and amenity of the surrounding area.

3. I have noted that according to the council's rural settlement analysis there is limited infrastructure capacity and primary school capacity to accommodate new development in the village and that there are already 2 allocated housing sites for 48 dwellings. I acknowledge that these constraints might be overcome through developer contributions although the resultant impact on the overall viability of the proposed development is unknown.

4. Given all of the above and in particular, the lack of need for new housing sites in East Renfrewshire in general, I find that there is insufficient justification for the development of this site for housing and that it should remain designated as urban green space. I consider the council's site evaluation methodology to be both thorough and robust and the disagreement with regard to the site's scoring, together with the arguments advanced that this is an effective, accessible, infill site which has limited visibility and which could provide a high quality development with an element of affordable housing, do not alter my opinion that the development of the site for housing would be unacceptable.

LDP74 – Libo Avenue

5. This green belt site is located to the north of Uplawmoor and slopes down towards Lochlibo Road behind the existing housing along Libo Avenue. The site is split between an area of overgrown grassland, bushes and less mature trees to the west and an area of mature woodland to the east. The entire site is identified in the proposed plan as a Local Biodiversity Site and part of the green network. The area to the east is a Tree Preservation Area. I noted on my site visit that much of the site appears to be currently used by the residents of Uplawmoor as a recreational asset. The recreational use of the site is evident by a network of well-used informal paths which run across it.

6. The green belt landscape character of the area is described as being of weak to moderate value in the council's Green Belt Landscape Character Assessment. I accept that a more robust green belt boundary could be achieved by following Lochlibo Road. However, the existing boundary could be strengthened through landscape enhancement and reinforcement. Regardless of the impact on the character, setting and identity of the village, I am not convinced that the provision of a more robust green belt boundary justifies the deletion of a site of this size from the green belt to provide 3 self-build houses. Furthermore, I am satisfied that the proposed plan already provides more than adequate housing for the needs of both Uplawmoor and East Renfrewshire in general. This includes 2 housing sites allocated for 48 dwellings in Uplawmoor itself.

7. I acknowledge the offer of gifting part of the site to the community for a local woodland nature park and the evidence submitted with regard to the accessibility of the site, the adequacy of utilities and services, marketability and viability. However taking into account all of the above, this does not alter my view that the site should remain in the green belt.

Reporter's recommendations:

No modifications.

Issue 9.2.7	SUBMITTED HOUSING SUPPLY WATERFOOT	
Development plan reference:	Policy SG1: Housing Supply Policy SG2: Distribution of New Housing Schedule 10: Distribution, Capacity and Phasing of Additions to the Housing Land Supply	Reporter: Michael Cunliffe
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Mactaggart and Mickel Homes Limited (Ref 703/10) Francis Baird and family (Ref 979/2)</p> <p><u>Appendix 1 – Standard Letter</u> Standard Letter Comment SG1C (4 reps) (Ref 1006/1)</p>		
Provision of the development plan to which the issue relates:	<p>New Housing Development Locations: LDP15A/B West Glasgow Road LDP88 (Part of) Land at Waterfoot Bridge</p>	
Planning authority’s summary of the representation(s):		
<p><u>(a) LDP15A/B West Glasgow Road</u></p> <p><u>Objection</u></p> <p><u>Francis Baird and family (Ref 979/2)</u> Promotion of site LDP15A/B Development at Waterfoot would assist in achieving LDP objectives Site can meet SP1 Site can deliver developer contributions Masterplan proposals could provide planned an incremental expansion of Waterfoot 35-40% affordable housing to meet local housing needs 100 units 2012-2020, 50 2020-2025, 50 post 2025 Potential for live-work units Potential to [provide affordable housing, community benefits and green space/park. Have not met SDP housing numbers for overall housing requirement Site Evaluation Assessment: Amend scoring sites LDP15A and LDP15B to '0'</p> <p><u>Standard Letter Comment SG1C (4 reps) (Ref 1006/1)</u> Support retention of LDP15A,B and 16B, Waterfoot in Green Belt Object to any large scale development in current Green Belt in rural areas.</p> <p><u>(b) LDP88 (Part of) Land at Waterfoot Bridge</u></p> <p><u>Objection</u></p> <p><u>Mactaggart and Mickel Homes Limited (Ref 703/10)</u> Non-inclusion of site: Part of LDP88 Land at Waterfoot Bridge Promoting inclusion of site part of LDP88 Land at Waterfoot Bridge Waterfoot Bridge could provide additional site in short to medium term</p>		

Modifications sought by those submitting representations:**(a) LDP15A/B West Glasgow Road****Francis Baird and family (Ref 979/2)**

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10 – 200 units.

Removal of site from Green Belt.

(b) LDP88 (Part of) Land at Waterfoot Bridge**Mactaggart and Mickel Homes Limited (Ref 703/10)**

Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10 – 50 units.

Removal of site from Green Belt.

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

Justification for the Development Strategy of the Plan is demonstrated under Issue 2.1.2: Development Strategy. The Council's approach to housing supply is also addressed under Issue 2.1.2 and Issue 9.1: Housing Supply. 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/69) and the Approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81). The effectiveness and justification of the individual and larger scale master plan sites, coordinated approach to infrastructure delivery and Green Belt boundary has also been demonstrated.

A number of new housing sites have been released in the Proposed Plan to meet housing needs in the Eastwood HMA, such as the SDO at Malletsheugh/Maidenhill and sites at Hillfield and Barcapel and site SG2.6 East Glasgow Road Waterfoot.

A detailed analysis of the 4 rural settlements was undertaken (Appendix C of the Monitoring Statement refers) to inform the Plan. This study looked at a variety of factors including role and function, infrastructure, services and facilities, public transport, current consents and previous build rates to assess whether the rural settlements could accommodate further growth. For Waterfoot it was concluded no additional land should be released and the site at East Glasgow Road (SG2.6) for 28 units would provide appropriate levels of growth for the village.

(a) LDP15A/B West Glasgow Road**Objections****Francis Baird and family (Ref 979/2)**

An objection was received regarding the non inclusion of the site as a preferred housing site under Policy SG1 and Schedule 10 and inclusion of Economic Designation under Schedule 13.

This green field site is bounded by Residential properties to the North, Glasgow Road to the east with open fields beyond. Linn Products borders the site to the south west. Glasgow Road and Floors Road establish strong Green Belt boundaries.

The Landscape Character Assessment (LCA) identifies the Green belt landscape character as being of moderate – strong value. The site is particularly prominent to people travelling into Waterfoot along Glasgow Road. The site contributes to the open and rural setting of the village and to the wider green corridor between Waterfoot and Eaglesham, although this has been reduced by the development of the GSO. Development would represent a substantial intrusion into the Greenbelt.

It is recognised that the representation provides additional information on design, layout and mitigation planting.

The representation also seeks an element of economic development within the southern section of the site. Waterfoot has limited services and facilities and development may provide additional opportunities and community facilities. The Council is supportive of a spread of economic opportunities across the Authority.

Over successive Development Plans Linn Products has consistently operated an internationally successful company within its establishment at Waterfoot. The operation of the company has benefited from its particular countryside setting within the greenbelt. The Council does not wish to alter the greenbelt designation which this company has successfully operated within over many years. Therefore this site is retained within the greenbelt.

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 PoAN (2014/0109/PAN) has been submitted by Gladman properties seeking residential development of the site.

The 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 Plan to meet housing and economic 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 not proposed to modify the Plan based upon the above.

Standard Letter Comment SG1C (4 reps) (Ref 1006/1)

Support for the retention of the green belt at Waterfoot is noted and welcomed. Objections to any large scale development are addressed under Issue 2.1: Development Strategy and the Rural Analysis where the Plan does not support any additional green belt releases in the village.

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

(b) LDP88 (Part of) Land at Waterfoot Bridge

Objection

Mactaggart and Mickel Homes Limited (Ref 703/10)

An objection was received regarding the non inclusion of the site as a preferred housing

site under Policy SG1 and Schedule 10.

This green field site is bounded by Glasgow Road a tree belt with open fields beyond. Glasgow Road establishes a strong Green Belt boundary.

The LCA identifies the Green belt landscape character as being of moderate – strong value. The site is prominent to people travelling into Waterfoot along Glasgow Road. The site contributes to the open and rural setting of the village and to the wider green corridor between Waterfoot and Clarkston. Development would represent a substantial intrusion into the Greenbelt.

It is recognised that the representation provides additional information on design, layout and mitigation planting to reinforce the landscape edge and retain separation from the cottages at Milerston.

It is accepted that a house builder is actively involved with the site. The representation also states that the site is effective and deliverable.

Notwithstanding the above, the 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 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 not proposed to modify the Plan based upon the above.

Reporter's conclusions:

Overview

1. The conclusions under Issues 2.1.1, 2.1.2 and 9.1 find that the overall vision and development strategy of the proposed plan is appropriate and that adequate housing land has been provided in line with the requirements set out in the Glasgow and the Clyde Valley Strategic Development Plan. The proposed plan provides considerably in excess of the strategic development plan requirement for private housing and adequate justification is provided for not meeting the affordable housing requirement. There is no numerical justification to allocate further sites for private housing.

LDP15A/B West Glasgow Road

2. These combined sites occupy a large area of farmland between Glasgow Road and the Linn Products factory on the south-west side of Waterfoot. The original representations on behalf of the landowners sought allocation of the whole area for housing, but in May 2014 the council received notification from Gladman Developments Limited that it was acting for the owners in promoting a smaller, single phase development site. The site is now a slightly enlarged version of LDP15B running alongside Glasgow Road from the Linn Products access road in the south to Floors Road in the north. It is this site that I shall deal with.

3. The site comprises an undulating grass field slightly above the level of Glasgow Road, from which it is separated by a stone wall. The field contains four prominent clumps of

mature deciduous trees, which are included within the development site and contribute to a parkland appearance. The Landscape Character Assessment identifies the green belt landscape character as being of moderate – strong value. Glasgow Road provides a robust green belt boundary. This is a prominent site which contributes to the open and rural setting of the village.

4. The development proposal is for about 100 houses and would retain, and aim to enhance, the key landscape features of tree-topped roundels. It would be separated by about 300 metres from the Linn Products factory, and would not significantly affect the factory's rural setting. There is some evidence that the site would meet effectiveness criteria. However, development would represent a significant intrusion into the green belt and a major change to the landscape setting of Waterfoot. The recent representations in favour of development seek to question the council's analysis of the need for housing land and the effectiveness of existing allocated sites. However, as indicated above, I do not accept that there is a shortfall that would justify further releases from the green belt; and even if there were, I do not consider that this site would rate a high priority in any additional allocations.

LDP88 (Part) Land at Waterfoot Bridge

5. This roughly triangular site lies east of Eaglesham Road (the northward continuation of Glasgow Road) at the north end of Waterfoot. It is bounded to the south-east by the White Cart Water, to the west by Eaglesham Road and to the north by a belt of trees. About 60-70 metres to the north on Eaglesham Road is a short row of houses at Millerston. At the south-west corner is Waterfoot Farm, which has been developed for residential use. Part of the site near the White Cart Water is subject to flood risk. The green belt landscape character is identified as being of moderate – strong value. The site is highly visible to people entering Waterfoot along Eaglesham/ Glasgow Road. The site contributes to the open and rural setting of the village and to the green corridor between Waterfoot and Clarkston. This corridor is only about 600 metres wide between Waterfoot Bridge and Williamwood High School, and is already punctuated by Millerston. Development would represent a significant intrusion into the green belt and reduce the separation between Waterfoot and Clarkston by about one third.

6. The representation promoting the site for housing development argues that much of it is hidden from view, and that the visible section near the main road could be developed and landscaped so as to maintain a clear separation from Millerston and reduce the visual impact of the houses as seen from the road. There is evidence that effectiveness criteria could be satisfied. However, given that there is no need for additional private housing sites, and there would be impacts on the green corridor and the setting of Waterfoot, I consider that the site should remain as green belt.

Reporter's recommendations:

No modifications.

Issue 10	AFFORDABLE HOUSING AND HOUSING MIX	
Development plan reference:	Policy SG4: Housing Mix in New Developments Policy SG5: Affordable Housing	Reporter: Katrina Rice
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Ian Davidson (Ref 9/2) Miss V I Rowan (Ref 19/1) Kenneth Wharton (Ref 75/3) James Whyteside (Ref 82/4) Robert Johnston (Ref 131/5) McCarthy and Stone Retirement Lifestyles Ltd (Ref 243/1) Claire Wharton (Ref 419/8) Link in consultation with Barrhead, Arklet and Hanover Housing (Ref 669/2) Persimmon Homes Ltd (Ref 743/4) (Ref 743/5) Nazir Ahmed (Ref 755/6) (Ref 755/27) Homes for Scotland (Ref 758/1) (Ref 758/4)</p> <p><u>Appendix 1 – Standard Letter</u> Standard letter comment SG5A (68reps) (Ref 1013/1)</p>		
Provision of the development plan to which the issue relates:	Chapter 6: Sustainable Economic Growth Para. 6.6-6.7.1 – Housing Mix in New Developments Para. 6.8 – 6.9.2 – Affordable Housing	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy SG4: Housing Mix in New Developments</u></p> <p><u>Support</u></p> <p><u>Nazir Ahmed (Ref 755/6)</u> - We support Policy SG4 (Housing Mix in New Developments) subject to the proposed amendment</p> <p><u>Objections</u></p> <p><u>Miss V I Rowan (Ref 19/1)</u> We have a huge increase in the elderly population in Barrhead and need: Retirement flats with lifts etc - For rent and for sale. Sheltered accommodation. Sheltered housing with assisted living.</p> <p><u>Homes for Scotland (Ref 758/1)</u> Paragraph 6.6.3 contains a reference in the final sentence to homes built to adaptable and accessible standards. The 2010 Building Regulations now contain all the provisions that used to be contained in Building for Variable Needs, a set of standards devised for subsidised housing and containing provision for adaptable and accessible design to suit disabled and other particular needs. All new houses therefore already cater for a wide range of possible needs. The final sentence of paragraph 6.6.3 is superfluous.</p>		

(b) Policy SG5: Affordable Housing**Support**

Nazir Ahmed (Ref 755/27) - Support policy

Objections

Ian Davidson (Ref 9/2) - Respondent works in the social welfare advice sector (not in East Renfrewshire). There is a major housing crisis in Scotland especially in relation to affordable housing and changes to HB etc. Would be more supportive of any proposed housing developments if they had significant and not simply tokenistic affordable housing element for a balanced mix of population in the village. (Neilston)

Kenneth Wharton (Ref 75/3) - Policy implies that minimum 25% contribution can be met by three equal options of on-site, commuted sum or off-site -Important to emphasise that on-site provision should take precedence. Off-site and commuted sum should only be considered under very exceptional mitigating circumstances failure to do so could lead to - affordable housing shortfall not addressed, selective development of prime local instead of areas of housing requirement, lack of mixed and inclusive communities

James Whyteside (Ref 82/4)

Housing for over 65s is identified (section 2.2.4) but not followed through by reference to social housing in policy.

Anecdote and experience suggest that social housing offered by developers is simply a way of obtaining planning permission on Green Belt or amenity land with few questions asked (e.g. Waterfoot and Eaglesham). How will this, and the increasingly expensive provision of McCarthy and Stone type developments, address the problem?

Robert Johnston (Ref 131/5)

Commutation is abhorrent, developers should not be allowed to exclude affordable from their site and will not delivered the needed affordable housing

No substantiation of affordable housing needed in Eastwood over Levern Valley
Affordable housing need should be calculated over the whole country not for social economic reasons

McCarthy and Stone Retirement Lifestyles Ltd (Ref 243/1)

As submitted previously, consider the requirement for all developments of 4 or more dwellings to provide 25% affordable housing too rigid.

Commend the Council, however, for commitment to a more flexible approach (para 2.1.4.) which is expressed throughout the SPG, particularly with regard to onsite contributions. The Council need to ensure this approach is adopted pragmatically.

Claire Wharton (Ref 419/8)

On site provision of affordable housing should take precedence over off site or commuted sum

Commutated sum should be considered only under very exceptional circumstances
Wording from existing H3 affordable housing policy should be reinstated

Link in consultation with Barrhead, Arklet and Hanover Housing (Ref 669/2)

The LDP should take account of welfare reform which may have an impact on property size

An assessment on the sustainability of tenancies when a site for affordable accommodation is considered by way of access to adequate public transport services and local amenities

Para 6.2.5 states reduction in affordable housing targets due to reduction in public subsidy levels. Council should be taking issue to Government to review level of subsidy
Developer led affordable housing will not deliver requirements for social rent, this can only be done by developing with RSLs

ERC has been identified as having significant pressure for affordable housing reducing / 3000 people waiting for social housing should be made a priority – ERC have reduced target

Pot should be set up for commuted sums and this used to contribute to shortfall in social rent projects

In absence of grants, subsidy from others needs to be addressed through affordable housing policy

Strategy should be put in place for a holistic solution to deliver affordable housing on targeted sites

Project group with RSLs set up

Persimmon Homes Ltd (Ref 743/4) (Ref 743/5)

(Ref 743/4) Previously too much emphasis has been placed on the requirement for 'social housing' delivery through a registered social landlord, particularly with the difficulty surrounding access to funding. Delivery mechanisms should be flexible to ensure that East Renfrewshire Council and Private Housebuilders can satisfy the demand for affordable housing within the East Renfrewshire without the requirement to obtain funding through an RSL.

Page 56, Para 6.8.2 - requires private developments "to provide an element of affordable housing..". This phrase could be misinterpreted as a requirement for a developer to physically construct the affordable element of housing.

(Ref 743/5) Policy SG5, Page 57 - seeks a "minimum 25% affordable housing contribution". This is contrary to SPP and is not in practice deliverable. SPP sets a benchmark of 25% affordable housing provision, the exact percentage to be determined through a needs assessment. SPP further notes that a percentage higher than 25 is only justifiable on specific site in exceptional circumstances. PAN 2/2010 sets out an approach to a realistic appraisal of land, financial resources and deliverability in order to determine the percentage.

Practice has shown that the cost to the developer of providing homes, either intermediate tenure or low-cost market homes, is higher per unit than providing land. If a developer opts to provide homes – usually because no social housing provider can guarantee having the funds to build on any land transferred to them - he can provide fewer than 25% of the site capacity for the equivalent cost. In practice, it has emerged that the percentage deliverable by this method varies widely depending on tenure and size of property. The imposition of a "minimum" 25% is entirely impractical. The policy must also have flexibility to account for viability considerations and for the principle of equivalent cost.

Homes for Scotland (Ref 758/4)

Paragraph 6.8.2 requires private developments "to provide an element of affordable housing..". This is potentially-misleading. It should be replaced by something which refers more accurately to SPP. Policy SG5 states that the Council "will require provision to be made for..." affordable housing and this wording should be replicated in 6.8.2. "minimum 25% affordable housing contribution". This is contrary to SPP and is not in practice deliverable.

Practice has shown that the cost to the developer of providing homes, either intermediate tenure or low-cost market homes, is higher per unit than providing land. If a developer opts to provide homes - he can provide fewer than 25% of the site capacity for the equivalent cost. In practice, it has emerged that the percentage deliverable by this method varies from zero, where viability is an issue, up to around 15% depending. The policy must also have flexibility to account for viability considerations and for the principle of equivalent cost.

Standard Letter Comment SG5A (66 reps) (Ref 1013/1)

Affordable housing should be located where there is need not where developers make the most profit.

Shortfall in affordable housing should apply over whole of ER not to artificial sub areas no perceived need or demand for affordable housing in locality (Newton Mearns).

Modifications sought by those submitting representations:

(a) Policy SG4: Housing Mix in New Developments

Miss V I Rowan (Ref 19/1) - Policy should focus on delivery of sheltered accommodation to meet needs of elderly population.

Homes for Scotland (Ref 758/1) - Delete final sentence of paragraph 6.6.3.

Nazir Ahmed (Ref 755/6) - Reword policy as follows: "The design should include smaller house types and an element of accessible and adaptable properties to meet the diverse needs of our ageing population, including of the growing under-represented minority ethnic communities and households with particular needs."

(b) Policy SG5: Affordable Housing

Ian Davidson (Ref 9/2) - Policy requires to be strengthened to deliver necessary levels of affordable housing.

Kenneth Wharton (Ref 75/3) - Policy SG5 should be reworded to strongly emphasise on-site affordable housing provision has precedence over all other options.

James Whyteside (Ref 82/4) - Plans and Policies should strongly refer to meeting needs of elderly population.

Claire Wharton (Ref 419/8)

Policy SG5 should be reworded to strongly emphasise on-site affordable housing provision has precedence over all other options.

Wording from existing H3 affordable housing policy should be reinstated.

behalf of McCarthy and Stone Retirement Lifestyles Ltd (Ref 243/1) - Threshold of 4 or more should be raised.

Link in consultation with Barrhead, Arklet and Hanover Housing (Ref 669/2)

The LDP should take account of welfare reform which may have an impact on property size.

Affordable housing target should be increased.

Subsidy from others needs to be addressed through affordable housing policy.

Strategy should be put in place for a holistic solution to deliver affordable housing on targeted sites.

Plan should be clear that RSLs developer led affordable housing will not deliver requirements for social rent, this can only be done by developing with RSLs.

Persimmon Homes Ltd (Ref 743/4) (Ref 743/5)

An explanation, either as an appendix, or within the policy should be included to explain the acceptable types of affordable housing which should then be discussed with planning/housing on a site by site basis. Low cost for sale, mid market rent and shared equity are all acceptable forms of affordable housing which are easier to implement than delivery through an RSL.

Paragraph 6.8.2 sentence 1 delete “provide”; replace with “make provision for”.

Policy SG5: Affordable Housing line 3 delete “minimum”. Add a new third sentence: “All forms of contribution will result in the same cost to the developer as the cost of transferring serviced land to a social housing provider at a value reflecting its use as affordable housing.”

Homes for Scotland (Ref 758/4)

Paragraph 6.8.2 sentence 1 delete “provide”; replace with “make provision for”.

Policy SG5: Affordable Housing line 3 delete “minimum”. Add a new third sentence: “All forms of contribution will result in the same cost to the developer as the cost of transferring serviced land to a social housing provider at a value reflecting its use as affordable housing.”

Robert Johnston (Ref 131/5), Standard Letter Comment SG5A (66 reps) (Ref 1013/1)

Policy should not apply to Newton Mearns.

Summary of responses (including reasons) by planning authority:

(a) Policy SG4: Housing Mix in New Developments

Objections

Mrs V I Rowan (Ref 19/1)

Current and projected changes to East Renfrewshire’s older population are outlined within the Monitoring Statement (CD/08). The requirement for older persons housing is identified both through housing needs assessments and joint work with East Renfrewshire’s Community Health and Care Partnership (CHCP) to address Reshaping Care for Older People. The Council’s Local Housing Strategy (LHS) (CD/57) supports the CHCP’s Plans for shaping services to meet the needs of older people, and the Joint Commissioning Plan includes a Housing Contribution Statement which sets out our understanding of the needs of this group and planned work to fill gaps in this knowledge, allowing the Council to plan effectively to meet their needs.

The Joint Commissioning Plan reflects the Scottish Government’s national vision for older people, as set out in ‘Age, Home and Community – A Strategy for Housing Scotland’s Older People 2012-2021’, which is to support older people ‘to enjoy full and positive lives in their own home or in a homely setting’. As well as specially designed housing, this also includes supporting people to remain at home (for example with the help of adaptations and support) where possible taking into account their needs and preferences. The implementation of the Joint Commissioning Plan 2013-2016 as it progresses will allow us to appropriately reflect the need for additional housing for this group in the Strategic

Housing Investment Plan (SHIP) 2013-2018 (CD/60), which is reviewed annually. The Council's requirement for meeting the needs of the elderly population is reflected in section 6.6 of the Proposed Plan and in particular Policy SG4: Housing Mix in new developments. This policy has been derived from requirements identified through the Local Housing Strategy and Strategic Housing Need and Demand Assessment (CD/82). The specific housing requirements of the elderly population will be considered and reflected in the housing mix agreed for new housing developments.

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

Homes for Scotland (Ref 758/1)

The Council notes and sees merit in the comments received in relation to paragraph 6.6.3.

If the Reporter is so minded the to agree with the representation from Homes for Scotland the Council would be supportive of the following minor modification because it would not have any implications for the Strategy or other policies within the LDP.

Delete last sentence of paragraph 6.6.3 and replace with:

Changes made to building standards in 2010 mean that all new houses are now built to cater for a variety of particular needs.

Nazir Ahmed (Ref755/6)

The Council acknowledges and welcomes the support for Policy SG4.

The Council do not, and have no specific plans at present, to provide developments targeted at specific ethnic minority groups. The Strategic Housing Need and Demand Assessment (SHNDA) and related local needs analysis serves to ensure that the needs of the different households present in our population are considered and reflected in our planning for housing. Whether this results in a need for particular sizes, types of housing, in certain locales, or for those with very specific needs (for example wheelchair suitable), requirements are reflected in the Council's Local Housing Strategy and Strategic Housing Investment Plan, to ensure a good mix of housing is provided across sites, taking into account and balancing all identified needs.

The current SHNDA is being updated for 2014, and the analysis of the needs of minority or particular needs groups is a priority focus locally and for the Scottish Government. The outcomes of this work, as well as ongoing work of the Local Housing Strategy to consider particular needs, will be reflected in the Council's Strategic Housing Investment Plan.

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

(b) Policy SG5: Affordable Housing

Support

Nazir Ahmed (Ref 755/27)

The Council acknowledges and welcomes the support for Policy SG5.

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

Objections

Ian Davidson (Ref 9/2), Kenneth Wharton (Ref 75/3), Robert Johnston (Ref 131/5), Claire Wharton (Ref 419/8), McCarthy & Stone Retirement Lifestyles Ltd (Ref 243/1), Standard letter comment DG5A (66reps) (Ref 1013/1)

The support for the more flexible approach outlined in paragraph 2.1.4 is welcomed. Both SPP (CD/69) and the Chief Planner's Letter on Affordable Housing Policies (June 2011) set out that innovative and flexible approaches (as detailed in the Proposed Affordable Housing SPG paragraph 1.1.8) are required to deliver affordable housing in suitable numbers, and that affordable housing policies should be realistic and take into account considerations such as development viability and the availability of funding. In the current economic climate the Council has sought to increase flexibility within Policy SG5 and its supporting SPG. The supporting SPG on affordable housing does refer in paragraphs 2.3 and 2.4 that developers will normally be expected to make provision for a minimum capacity of 25% affordable dwellings on site. The increased flexibility of the policy is considered appropriate, and has been supported in a number of representations; the Council does not propose reverting back to the stronger, less flexible, wording of the Adopted Local Plan Policy H3 (2011). However the Council will endeavour to determine and secure the most appropriate form of contribution in each particular case, taking all matters, including development viability, into account and ensuring that the solutions agreed will meet housing needs and be affordable to those on modest incomes (paragraph 2.4.4). Commuted payments are an option supported through SPP and PAN 2/2010.

The Council's affordable housing policy applies across the whole of East Renfrewshire. The Strategic Development Plan, Strategic Housing Need and Demand Assessment, the Council's Local Housing Strategy and Proposed Local Development Plan supporting documentation, all provide evidence that affordable housing need exists across the local authority area, and this need is particularly significant in the Eastwood area (which includes the Newton Mearns area). As per SPP, where the housing need and demand assessment and local housing strategy identify a shortage of affordable housing, it should be addressed in the development plan as part of the housing land allocation, and the need for affordable housing should be met, where possible, within the housing market area where it has arisen.

It is considered that the Council's minimum 25% policy sets an appropriate level of contributions. Increasing this requirement for the Eastwood side of the authority was explored at MIR stage (CD/03); however this was not taken forward in the Proposed Plan. Viability is a key consideration in delivery and increasing percentage requirements could significantly impact upon this in the current economic climate and ultimately prevent developments being brought forward. Housing needs would not justify increasing the percentage requirement, beyond the minimum 25% already within the Proposed Plan, in the Lavern Valley area of the authority (including Neilston). The Council can however, through Proposed Policy SG4, discuss with developers at pre-application stage the need for specific house types and sizes where there is a known local need.

The Council considers that there is sufficient affordable housing need, identified and evidenced in the Strategic Development Plan, Strategic HNDA, Local Housing Strategy and 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.

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

James Whyteside (Ref 82/4)

Issues covering elderly persons housing is addressed fully under Section (a) above.

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

Link in consultation with Barrhead, Arklet and Hanover Housing (Ref 669)

Recent changes to welfare reform are noted and of importance is the significant shortage of smaller accommodation locally. Where this need exists, it will be reflected in the housing mix being sought via the Council's Local Housing Strategy, Policies SG4 and SG5 and the Strategic Housing Investment Plan programme. This however has to be balanced with delivering housing which is sustainable in the long term. This will also be taken account of in the refreshed Strategic Housing Need and Demand Assessment as its impacts emerge more clearly, and will filter through to the work of the Local Housing Strategy and Local Development Plan.

Paragraph 6.2.5 of the Proposed Plan refers to the setting of housing supply targets at a lower level than those expressed in the SHNDA and SDP. The targets set reflect the need to set 'realistic and achievable' targets for delivering affordable housing in the local area and the reduction can be largely be attributed to the significant reduction in public subsidy levels. The priority remains for delivery of social rented housing as reflected in the affordable housing policy and our SHIP programme, particularly where the use of grant subsidy is concerned. Where possible developers are being encouraged to devise affordable housing schemes, if these are not for social rent in partnership with the Council or an RSL, where reduced or no grant funding would be sought.

The issue of assessed need versus available subsidy (and other resources for development such as land availability and cost) are highlighted to the Scottish Government through the Strategic Housing Need and Demand Assessment process and through the annual review of the Council's Local Housing Strategy and Strategic Housing Investment Plan programme. The context remains challenging with reductions in public subsidy across the board.

The Council collects both Commuted Sums and Council Tax Second Homes Discount into a ring fenced affordable housing fund which will be used to help meet identified housing needs. This is reported through the Council's Strategic Housing Investment Plan.

In response to a comment on a holistic solution to deliver affordable housing on targeted sites and a project group with RSLs, this is something that has been raised at the Council's Housing Providers Forum and the Council are looking to take this forward in the 2014.

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

Persimmon Homes (Ref 743/4, 743/5); Homes for Scotland (Ref 758/4)

The Council considers that sufficient flexibility has been built into Policy SG5 and its supporting supplementary guidance to ensure that the Council and private house builders can work to address affordable housing need both with and without subsidy. The supporting supplementary planning guidance (paragraph 2.5.1) allows for all cases to be assessed on an individual basis, and a balanced and realistic view to be taken when making a recommendation on the appropriateness of affordable housing contributions. Although social rented housing remains the greatest need within the Eastwood area of

the authority, where funding is not available for this, the supplementary planning guidance allows for other types of affordable housing to be considered (appendix 2 page ii), or where these options are not possible, consideration of a commuted sum or off site provision.

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

The acceptable affordable housing tenure types are listed within Appendix 2 of the supporting supplementary planning guidance on affordable housing. As per SPP the Council considers this the appropriate location for this level of detail.

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

The Council agrees that deleting the word “provide” in sentence 1 of paragraph 6.8.2 and replacing it with “make provision for” would be more consistent with the aims and wording of Policy SG5.

If the Reporter is so minded the suggested amendments set out below by the respondent should be added to Para 6.8.2. The Council would be supportive of this modification because it would not have any implications for the Strategy or other policies within the LDP.

Para 6.8.2 should read (additional text in italics):

Policy SG5 aims to address this situation by requiring private sector housing developments to ~~provide~~ *make provision for an element of affordable housing.....*

The supporting supplementary planning guidance (paragraph 2.5.1) allows for all cases to be assessed on an individual basis, and a balanced and realistic view to be taken when making a recommendation on the appropriateness of affordable housing contributions. Scottish Planning Policy states a 25% benchmark, but goes on to advise that if a different percentage is required locally justified by the housing need and demand assessment and identified in the local housing strategy and development plan, then the 25% benchmark does not apply. The most recent SHNDA continues to demonstrate a significant need for affordable housing and continuing issues of affordability within East Renfrewshire, and particularly so in the Eastwood side of the authority, as detailed both within the both the Council's adopted Local Plan and adopted Local Housing Strategy (2012-2017), therefore the Council considers there is sufficient justification to maintain the Council's minimum 25% policy requirement. A detailed analysis of the SHNDA was carried out to set an all tenure housing supply target and how local housing needs will be addressed and is contained within Appendix H1 of the Monitoring Statement.

The Council considers that appropriate flexibility has been built into Policy SG5 and the supporting supplementary planning guidance. It is not felt appropriate for the policy to be modified to incorporate specific detail surrounding delivery, as the appropriate place for further detail is considered to be the supporting SPG. The SPG allows for negotiations for be carried out to determine appropriate fair and reasonable contributions, in line with SPP and PAN2/2010, taking all matters, including development viability into account.

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

Reporter's conclusions:Policy SG4: Housing mix in new developments

1. The council's policy recognises the increasingly aging population in East Renfrewshire in general and seeks to achieve a mix of house types, sizes and tenures in all new housing developments to accord with the council's Local Housing Strategy and the Glasgow and the Clyde Valley Housing Need and Demand Assessment. This includes properties to meet the needs of an elderly population and households with particular needs and could include an element of sheltered housing. The provision of smaller houses which are fully accessible and adaptable required by this policy or the adaptation of existing housing would also serve to meet the needs of an elderly population. The provision of sheltered housing is only one element in enabling older people and those with particular needs to live well in housing which best suits their needs. I have noted that the section on "Meeting particular needs" in the council's 2013 Strategic Housing Investment Plan (page 8) refers to the supply of various new properties in Barrhead for the elderly and physically disabled including improvements to an existing sheltered housing complex. Initiatives such as these together with the implementation of this policy will help to deliver mixed and inclusive communities. I am satisfied that the approach proposed by the council is appropriate.

2. I accept that reference should be made in the supporting text of this policy to Scottish Building Standards. However, I consider that the sentence referring to the importance of new developments including homes built to an adaptable and accessible standard should remain. This is an important aspect of housing mix and warrants mention in both the policy and supporting text.

3. Paragraph 6.6.3 of the supporting text to this policy already explains that the "households with particular needs" of most significance in East Renfrewshire include those with a disability, young people with complex needs and ethnic minorities. A further detailed reference to minority ethnic communities in the policy would be unnecessarily detailed as would the addition of the term "diverse". I find that the existing policy wording is acceptable.

Policy SG5: Affordable Housing

4. The Glasgow and the Clyde Valley Housing Need and Demand Assessment states that the affordable housing requirements identified for East Renfrewshire reinforce it as an area of on-going significant pressure for affordable housing and projects a shortfall of affordable housing over the plan period. Eastwood in particular is highlighted as an affluent area with a significant shortfall of affordable housing especially for social rent. It further states that significant future challenges remain in terms of land supply, the economy, funding constraints and the ability of the council and partners to deliver sufficient affordable housing supply to meet the needs identified. The Glasgow and the Clyde Valley Strategic Development Plan uses the housing need and demand assessment as its main evidence base and estimates the shortfall of affordable sector housing needs in East Renfrewshire for the period 2008 to 2025 as 3,200.

5. Policy SG5 seeks to address the issue of the delivery of affordable housing by requiring a minimum 25 percent affordable housing contribution for residential developments of 4 or more dwellings. However, some flexibility is introduced to the policy by allowing the contribution to be made on-site or by means of a commuted sum or off-

site in some circumstances. Reference is also made to “viability” as a key consideration when determining the suitable level of contributions. Further detailed information and guidance with regard to the definitions and types of affordable housing (including unsubsidised), the delivery approach, exceptions, viability, legal agreements and retention is provided in supplementary planning guidance. This recognises that given current market conditions, it is essential that the affordable housing policy allows flexibility and provides discretion for council staff to explore, negotiate and secure different and innovative solutions to affordable housing delivery (paragraph 1.1.8). Although the affordable housing contribution should normally be delivered on-site, in some cases off-site provision or payment of a commuted sum in lieu of on-site provision may be appropriate (paragraph 2.1.5).

6. Scottish Planning Policy states that the level of affordable housing required as a contribution within a market site should “generally” be no more than 25 percent of the total number of houses (paragraph 129). Consideration should also be given to the nature of the affordable housing required and the extent to which this can be met by proposals capable of development with little or no public subsidy. Given the significant shortfall identified in both the housing need and demand assessment and strategic development plan for the area, I find that the council’s approach of requiring a “minimum” 25 percent contribution on developments of 4 or more dwellings throughout the local authority area to be both proportionate and realistic within the context of the flexibility referred to in both the policy and accompanying supplementary planning guidance. I consider that both the council’s policies on affordable housing and housing mix will contribute towards a more balanced mix of residents in new housing developments. I have noted the contrary representations that the policy is either too strict or too weak but I am satisfied that the approach is reasonable and in line with Scottish Planning Policy. I agree with the council that specific detail with regard to delivery should be included in supplementary guidance rather than in the policy as recommended in paragraph 131 of Scottish Planning Policy.

7. While acknowledging the comments with regard to the level of government subsidy for affordable housing, welfare reform and the need for a closer working relationship between Registered Social Landlords, developers and the council, these do not alter my view that the approach in the proposed plan is reasonable.

8. The housings needs of an aging population are dealt with under Policy SG4 – Housing mix in new developments. I agree with the council that direct reference in the affordable housing policy is not necessary.

9. I do however accept that the use of the word “provide” in the first sentence of paragraph 6.8.2 could be misleading and should be amended to more closely reflect the wording of the policy.

10. The consideration of comments on the detailed content of supplementary guidance is outside my remit.

11. See also Issue 9.1 - Housing supply, delivery and distribution.

Reporter's recommendations:

I recommend that the following modifications be made:

1. Add the following to the final sentence of paragraph 6.6.3:

“...while recognising that Scottish Building Standards mean that all new houses are now built to cater for a variety of particular needs.”

2. Delete “provide” in the first sentence of paragraph 6.8.2 and replace with “make provision for”.

Issue 11	ECONOMIC DEVELOPMENT	
Development plan reference:	Policy SG6: Economic Development Schedule 12: Safeguarded Business and Employment Areas Schedule 13: Business Proposals	Reporter: Michael Cunliffe
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>SEPA (Ref 70/34) (Ref 70/36) (Ref 70/39) (Ref 70/43) James Whyteside (Ref 82/12) Personal Pension Trust (Ref 274/3) Roger Spooner (Ref 387/5) East Renfrewshire Green Belt (Newton Mearns) (Ref 463/5) Glasgow City Council (Ref 465/3) Thornliebank Community Council (Ref 504/6) Keith A Vallance (Ref 536/8) (Ref 536/11) (Ref 536/12) Nazir Ahmed (Ref 755/28) Greenlaw Park Limited (Ref 775/1) (Ref 775/2) Francis Baird and family (Ref 979/3)</p>		
Provision of the development plan to which the issue relates:	<p>Chapter 6 Sustainable Economic Growth Economic Development – Para. 6.10-6.11.1 New Site Linn Products Waterfoot Policy SG6.1 Field Road, Busby Policy SG6.6 Muriel Street, Barrhead Policy SG6.14 Spiersbridge Business Park, Thornliebank Policy SG6.23 Spiersbridge Business Park, Thornliebank Policy SG6.10 Greenlaw Business Park, Newton Mearns Policy SG6.20 Greenlaw Business Park, Newton Mearns</p>	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy SG6: Economic Development</u></p> <p><u>General</u></p> <p><u>Glasgow City Council (Ref 465/3)</u> - It is noted that the East Renfrewshire economy is closely linked to that of the City, and that out-commuting is likely to be an issue for the period covered by the Plan. It is also considered that the proposed developments outlined in the Plan at this stage are unlikely to alter this long established functional relationship to any great extent.</p> <p><u>Objections</u></p> <p><u>James Whyteside (Ref 82/12)</u> - Leisure and tourism development at country park will ruin it.</p> <p><u>Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/5)</u> There is no schedule of business/employment land requirements for the Proposed Plan period set out in the text nor is there any comparison between requirements and existing supply of such land. The Proposed Plan should have set out a broad scale of requirement and provision, with the associated reasoned justification, so that reasonable comparisons can be made.</p>		

Schedule 12 does not provide acreage
 Schedule 13 no areas or timescales give
 Policy purely general, not linked site by site or on a phased basis, no targets given – therefore no quantitative basis for economic development objectives or method for assessing if met in future(including M2.1)
 Employment land and mixed-use may end up as housing (Greenlaw) they should not be included as they are not sustainable development
 SPP confirms Strategic sites for business use are to be identified in SDPs, the SDP does not identify any need for new strategic business sites in ER, planning authorities a 5 year supply of marketable sites – Proposed Plan does not do this as no acreage, supply figures or targets. Proposed plan should focus on previously developed sites and unused premises to provide economic development opportunities.

Support

Personal Pension Trust (Ref 274/3) - Safeguards business and employment areas, promotes new development but also allows for non-employment generating uses where sites are no longer required for their original purpose.

Roger Spooner (Ref 387/5) - Local employment is important to communities.

Nazir Ahmed (Ref 755/28) - Support policy

(b) New Site Linn Products Waterfoot

Francis Baird and family (Ref 979/3) - Remove Linn Products facility from Green Belt and allocate as Safeguarded Business and Employment area under Schedule 12

(c) Policy SG6.1 Field Road, Busby

Objection

SEPA (Ref 70/34) - Assessment of flood risk required.

(d) Policy SG6.6 Muriel Street, Barrhead

Objection

SEPA (Ref 70/36) - Assessment of flood risk required.

(e) Policy SG6.14 Spiersbridge Business Park, Thornliebank

Objection

SEPA (Ref 70/39) - Assessment of flood risk required.

Policy SG6.23 Spiersbridge Business Park, Thornliebank

Support

Thornliebank Community Council (Ref 504/6) - Support extension to business park.

Objection

SEPA (Ref 70/43) - Assessment of flood risk required.

(f) Policy SG6.10 Greenlaw Business Park, Newton Mearns**Objection****Keith A Vallance (Ref 536/8) (Ref 536/11)**

(Ref 536/8): Currently 54.24 hectares of Brownfield vacant land in Council area, this is weighted heavily towards business and industry (60%)

Close proximity to Glasgow limits need for this substantial area , as such, proposed land for business and industry should be reduced by 50%

This will release a further 16Ha for housing on brownfield land/ around 320 units

(Ref 536/11): Object to business use as this is contrary to SDP

Lack of demand for business in this location

Greenlaw Park Limited (Ref 775/1) - Reallocate as housing site

Policy SG6.20 Greenlaw Business Park, Newton Mearns**Objection****Keith A Vallance (Ref 536/12)**

Object to business use as this is contrary to SDP

Lack of demand for business in this location

Greenlaw Park Limited (Ref 775/2) - Reallocate as housing site

Modifications sought by those submitting representations:**(a) Policy SG6: Economic Development**

James Whyteside (Ref 82/12) - Delete proposals to provide Leisure and tourism development at Dams to Darnley Country Park.

Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/5)

The Proposed Plan should have set out a broad scale of requirement and provision, with the associated reasoned justification.

Schedule 12 should provide acreage.

Schedule 13 should provide areas and/or timescales.

Proposed plan should focus on previously developed sites and unused premises to provide economic development opportunities.

(b) Linn Products Waterfoot**Francis Baird and family (Ref 979/3)**

Inclusion of the site as a as Safeguarded Business and Employment area under Policy SG6 and Schedule 12.

Removal of site from Green Belt.

(c) Policy SG6.1 Field Road, Busby

SEPA (Ref 70/34) - Flood risk assessment required.

(d) Policy SG6.6 Muriel Street, Barrhead

SEPA (Ref 70/36) - Flood risk assessment required.

(e) Policy SG6.14 Spiersbridge Business Park, Thornliebank

SEPA (Ref 70/39) - Flood risk assessment required.

Policy SG6.23 Spiersbridge Business Park, Thornliebank

SEPA (Ref 70/43) - Flood risk assessment required.

(f) Policy SG6.10 Greenlaw Business Park, Newton Mearns

Keith A Vallance (Ref 536/11), Greenlaw Park Limited (Ref 775/1) - Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

Keith A Vallance (Ref 536/8) - Reallocate 50% of business land for housing.

Policy SG6.20 Greenlaw Business Park, Newton Mearns

Keith A Vallance (Ref 536/12), Greenlaw Park Limited (Ref 775/2) - Inclusion of the site as a preferred housing site under Policy SG2 and Schedule 10.

Summary of responses (including reasons) by planning authority:**(a) Policy SG6: Economic Development****General**

Glasgow City Council (Ref 465/3) - The Proposed Plan aims to support the local economy ensuring continued access to local work opportunities. Seeking higher skilled and higher value jobs close to where people live will also help to reduce out-commuting of the workforce and attract inward investment. New initiatives such as live/work units that encourage residents to work within their area are promoted. However the Council does acknowledge that the vast majority of residents travel out with the authority area and the need for good transport links to surrounding areas is essential.

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

Support

Personal Pension Trust (Ref 274/3), Roger Spooner (Ref 387/5), Nazir Ahmed (Ref 755/28)

The Council acknowledges and welcomes the support for Policy SG6.

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

Objections**James Whyteside (Ref 82/12)**

The Council recognises the importance of Dams to Darnley (D2D) Country Park and the recreational and environmental opportunities it provides. Recognition is also given that there are currently very limited facilities for visitors. Therefore the Council will aim to strike an appropriate balance whereby facilities are developed which complement the country park setting. Proposals require to be at a scale and of a design which will not compromise the setting and attraction of the Park.

The master plan proposals set out under Policies M2.1: M77 SDO – Malletsheugh/Maidenhill and M2.2 – M77 SDO – Barrhead South and their respective Development frameworks (CD/21) and (CD/23) will both contribute to improving facilities and accessibility to the Park. Further details are set out under Issues 3.3 and 3.4.

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

East Renfrewshire Green Belt (Newton Mearns) (Ref 463/5)

A central purpose of Scottish Government is to increase sustainable economic growth. This key aim is carried through into the Plan under Strategic Policy 1: Development Strategy. Schedules 12 and 13 contain a combination of existing sites, (containing both land and buildings) considered appropriate to safeguard and also additional economic opportunities.

During economic downturns the retention of employment sites to aid long term recovery will be important despite evidence of any perceived lack of short term demand.

Protecting and safeguarding the existing business and employment locations, providing significant opportunities for mixed use development at master planned areas in Barrhead and Newton Mearns, and enabling businesses to grow and expand through a positive and flexible policy framework, are key components of the strategy. Further information is provided within the Monitoring Statement (Appendix H2) with information on economic development, marketable land Supply, take-up rates, business starts and an update of adopted Local Plan Business Proposals. The Proposed Plan provides a strong focus on delivering Brownfield sites. It is not viewed necessary to include this information within the Plan.

The Development frameworks for the master plans at Malletsheugh/Maidenhill and Barrhead South provide further information on employment opportunities at these locations. It is not proposed that significant employment opportunities would be directed to these locations. Live/work units and commercial opportunities are to be promoted.

The Action Programme (CD/07) also provides a commentary on both actions and timescales for the business and employment areas & business proposals contained within Schedules 12 & 13.

East Renfrewshire does not have any Strategic Economic Investment Locations (SEIL's) within the SDP, however the SDP acknowledges that there are existing developments and existing locations which will continue to play an important economic, social and environmental role at the local level. The SDP is focused solely on strategy and on a limited number of priority development locations. Development proposals which do not have implications for the Spatial Development Strategy will fall within the consideration of

Local Development Plans.

Overall, the strategy will allow the Proposed Plan to remain flexible and able to respond to economic recovery and ensure that the local economy remains competitive over the life of the Plan.

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

(b) Linn Products Waterfoot

Francis Baird and family (Ref 979/3)

Over successive Development Plans Linn Products has consistently operated an internationally successful company within its establishment at Waterfoot. The operation of the company has benefited from its particular countryside setting within the greenbelt.

The Council does not wish to alter the greenbelt designation which this company has successfully operated within over many years. Therefore this site is retained within the greenbelt.

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

(c) Policy SG6.1 Field Road, Busby

Objection

SEPA (Ref 70/34)

Field Road is a long established employment location comprising a number of different active operators. There have been no significant development proposals at this site over recent years. In the event future proposals are forthcoming a full flood risk assessment will be required prior to development. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals.

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

(d) Policy SG6.6 Muriel Street, Barrhead

Objection

SEPA (Ref 70/36)

Muriel Street is a long established employment location comprising a number of different active operators. SEPA's Flood Risk Maps reveal only a small section of the site within an area subject to flood risk. In the event proposals are forthcoming for this small parcel of land a full flood risk assessment will be required prior to development.

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

(e) Policy SG6.14 and Policy SG6.23 Spiersbridge Business Park, Thornliebank**Support****Thornliebank Community Council (Ref 504/6)**

The Council acknowledges and welcomes the support for Policy SG6.23.

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

Objection**SEPA (Ref 70/39, 70/43)**

Spiersbridge Business Park is a long established employment location comprising a number of different active operators. The remaining areas of undeveloped land within the business park fall out with the flood risk zones, however, in the event future proposals are forthcoming for the remaining allocated land a full flood risk assessment will be required prior to development. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals.

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

(f) Policy SG6.10 and Policy SG6.20 Greenlaw Business Park, Newton Mearns Objections**Keith A Vallance (Ref 536/8, 536/11, 536/12), Greenlaw Park Limited (Ref 775/1, 775/2)**

The SPP requires Council's to ensure that there is a range and choice of marketable sites and locations for businesses. This site is considered an important element in providing a sustainable employment location for the local population.

The business designation of the site (Greenlaw Business Park) is not contrary to the SDP. The SDP acknowledges that there are existing developments and existing locations which will continue to play an important economic, social and environmental role at the local level. The SDP is focused solely on strategy and on a limited number of priority development locations.

Development proposals which do not have implications for the Spatial Development Strategy will fall within the consideration of LDPs, and the development management process. The Greenlaw Business Site is considered within that context.

Over successive Development Plans, the Council has also consistently refined areas for Business and Employment. For instance within the Proposed Plan the Shanks/Glasgow Road Strategic Development Opportunity significant adjustments have been made to Business and Employment Land with the Shanks site being reallocated for entirely residential development. Furthermore, Table F3 of the Monitoring Statement (Appendix F) clearly demonstrates that in developing the strategy for the Proposed Plan a detailed assessment was made of all vacant and derelict sites.

The significance of existing and continued links with Glasgow are acknowledged, however the Council has to strike a balance and believes that this has been provided for through the development strategy provided by the Proposed Plan. This Strategy will

allow the Plan to remain flexible and able to respond to economic recovery and ensure that the local economy remains competitive over the life of the Plan.

Policy SG 6 supports a more flexible approach away from the traditional class 4, 5, 6 to other employment generating uses. Proposals that can demonstrate that there is no requirement for office use at this location and which would bring significant new employment opportunities would be viewed on their merits.

One of the key findings by the reporter, (CD/02) to the adjacent housing site, was that the 'Adjacent Business area' (i.e. Greenlaw Business Park) would be capable of providing business opportunities for the area.

This site is within close proximity to a motorway connection and has major infrastructure (sewers & roads etc.) in place. This is the only 'Economic Development' site in East Renfrewshire which currently has these assets in place. This site forms an important element of the effective marketable business land supply.

This site is developer ready and an important element of providing a sustainable employment location for the local population and should be safeguarded accordingly. It is also not viewed necessary to allocate this site for mixed use development. Other sites have are identified in the Plan to meet housing and mixed use needs.

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

Reporter's conclusions:

Dams to Darnley Country Park

1. I agree with the council that development on an appropriate scale need not have an adverse effect on the park's qualities. Small-scale development such as a café, or facilities for bike hire or quiet water sports, would be acceptable if sensitively designed and located. I do not consider that any change to the proposed plan is necessary.

Reasoned justification

2. An analysis of the supply and take-up of business and employment land is set out in Appendix H2 of the Monitoring Statement. This shows a marketable land supply that would last for 28 years at recent take-up rates. I accept the council's argument that the economic downturn will have depressed demand, but even so the supply appears to me very generous. Any net additions to supply therefore need to be justified, and the cases for providing additional sites, or for reallocating existing sites for other types of development, need to be judged in that context. Some new provision within strategic development areas can be supported on the basis of providing employment close to where people live, and reducing the amount of commuting. I do not consider that any changes to the reasoned justification are required.

Linn Products, Waterfoot

3. No justification has been put forward to support the argument that the site should be removed from the green belt and included as a safeguarded business and employment area under Policy SG6 and Schedule 12. The Linn Products factory is a modern building that sits fairly comfortably within its countryside setting. It is important that any further

development on the site or in the surrounding area should continue to respect that setting, and it is appropriate that green belt policies should continue to apply.

Flood risk

4. The Scottish Environment Protection Agency has proposed that flood risk assessments should be required for development on a number of sites. Having regard to the Scottish Environment Protection Agency flood maps, these sites are affected to varying degrees. Policy E4 indicates that the council will resist development within areas that are at risk of flooding. It appears to me that this general policy would be sufficient where only a small part of an area allocated for development is at risk of flooding with an annual probability greater than 0.5 percent (1 in 200 years). Where, however, a substantial part of an area is at risk, this could impose a major constraint on development and I consider that the need for a flood risk assessment in such cases should be flagged up in the relevant schedule of the plan. In extreme cases, all or most of an area could be at flood risk and any new development would be inappropriate. Some such sites, however, have existing development on them, and alterations or extensions should be subject to flood risk assessment to ensure the risk is not made worse.

5. Of the economic development locations listed in Schedules 12 and 13, SG6.6 (Muriel Street, Barrhead) has only a very small area subject to flood risk, and no change to the proposed plan is required. SG6.1 (Field Road, Busby) has a large area close to the White Cart which is already developed and is liable to flood. SG6.14 and SG6.23 (Spiersbridge Business Park, Thornliebank) also cover an existing business park of which a substantial part (most of it already developed) is subject to flood risk. In the case of SG6.1, SG6.14 and SG6.23, I consider that the need for flood risk assessment should be indicated in the relevant schedule.

Greenlaw Business Park

6. Despite being a fully-serviced site for business and employment use, and being actively marketed for over 10 years, the area remains undeveloped with the rather unkempt appearance of an urban brownfield site. Together with the retail site (SG8.6) on the other side of Crookfur Road, it provides a somewhat dispiriting gateway to Newton Mearns for travellers arriving from the M77 at Junction 4. The site is the remnant of a larger area allocated in the local plan for business development as part of the Greenlaw Urban Expansion Area, the rest having been granted planning permission for housing on appeal in 2012. One of the reasons the 2012 appeal was allowed was because the potential remained to develop this adjacent site for business floorspace and to still provide a sustainable “community” development where people could live, work and shop.

7. The representations list a number of reasons why this site has proved unattractive for business development. Greenlaw does not benefit from any specific locational advantages. It is not within an Enterprise Zone, adjacent to an airport or within an urban regeneration area. There is no funding available for speculative office development, and no Regional Selective Assistance available for major companies coming into the Greenlaw area. There are high levels of supply of business/employment land across the West of Scotland.

8. The council argues that there needs to be a range and choice of marketable sites and locations for businesses, and that this site is within close proximity to a motorway connection and has major infrastructure in place. The site is considered an important

element of the effective marketable business land supply and is identified in the Monitoring Statement as the only “quality” site in East Renfrewshire. While there is currently little evidence of a local market for such land, and Appendix H2 of the Monitoring Statement notes that East Renfrewshire has a 28-year supply of business development land at recent take-up rates, I acknowledge that it is possible that the market could improve and that this well-positioned and serviced site could yet attract interest.

9. In addition, the proposed plan provides sufficient housing land elsewhere, and there is currently no need to release any of this site for housing development. In the event that the situation changed and additional housing was required while demand for business development remained depressed, an application to develop the site for housing or for mixed use could be considered under Policy SG6. In the meantime, the site should continue to be allocated for business and employment use.

Reporter’s recommendations:

I recommend that the following modifications be made:

1. In Schedule 12, SG6.1, after “Field Road, Busby” insert “*”
2. In Schedule 12, SG6.14, after “Spiersbridge Business Park, Thornliebank”, insert “*”
3. At the foot of Schedule 12 insert “* Development proposals will require to be subject to a flood risk assessment.”
4. In Schedule 13, SG6.23, after “Spiersbridge Business Park, Thornliebank”, insert “*”
5. At the foot of Schedule 13 insert “* Development proposals will require to be subject to a flood risk assessment.”

Issue 12	TOWN AND NEIGHBOURHOOD CENTRES	
Development plan reference:	Policy SG7: Town and Neighbourhood Centres Policy SG8: New Development and Business Improvement Districts Policy SG9: Protecting the Retail Function of the Town and Neighbourhood Centres Schedule 14: Town and Neighbourhood Centres Schedule 15: New Shopping Development Schedule 16: Business Improvement Districts	Reporter: Michael Cunliffe
Body or person(s) submitting a representation raising the issue (including reference number):		
<p><u>Proposed Plan Stage</u> SEPA (Ref 70/44) (Ref 70/45)(Ref 70/46) (Ref 70/47) (Ref 70/48) (Ref 70/49) James Whyteside (Ref 82/13) Co-operative Group (Ref 254/6) (Ref 254/7) James Sandeman (Ref 600/10) (Ref 600/11) (Ref 600/15) Nazir Ahmed (Ref 755/29) (Ref 755/30) (Ref 755/31) Greenlaw Park Limited (Ref 775/5) Barrhead Community Council (Ref 924/4)</p> <p><u>Modification Stage</u> Mearns Cross Shopping Centre (Ref 3988/1) (Ref 3988/2) (Ref 3988/3)</p>		
Provision of the development plan to which the issue relates:	Chapter 6 Sustainable Economic Growth Town And Neighbourhood Centres – Para. 6.12 – 6.15.1 Policy SG7.1 Barrhead Policy SG7.4 Newton Mearns Policy SG7.10 Sheddens, Eaglesham Road, Clarkston Policy SG7.16 Fenwick Road, Merrylee, Giffnock Policy SG7.26 Mearns Road, Newton Mearns Policy SG8.3 Main Street, Barrhead Policy SG8.6 Greenlaw, Newton Mearns Policy SG8.10 Clarkston Town Centre Policy SG8.12 Newton Mearns Town Centre	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy SG7: Town and Neighbourhood Centre Uses</u></p> <p><u>Support</u></p> <p><u>Co-operative Group (Ref 254/6)</u> - Supportive of policy and framework that establishes the assessment of retail, leisure, community and other complementary uses.</p> <p><u>Nazir Ahmed (Ref 755/29)</u> - Support policy</p>		

Objection

James Sandeman (Ref 600/10) - Are town centre focuses in priority order? Retail cannot stand alone in town centres.

Policy SG7.1 Barrhead

Objection

SEPA (Ref 70/44) - Assessment of flood risk required.

Policy SG7.4 Newton Mearns

Objection

SEPA (Ref 70/45) - Assessment of flood risk required.

Policy SG7.10 Sheddens, Eaglesham Road, Clarkston

Objection

SEPA (Ref 70/46) - Assessment of flood risk required.

Policy SG7.16 Fenwick Road, Merrylee, Giffnock

Objection

SEPA (Ref 70/47) - Assessment of flood risk required.

Policy SG7.26 Mearns Road, Newton Mearns

Objection

SEPA (Ref 70/48) - Assessment of flood risk required.

Modification Stage

Objection

Mearns Cross Shopping Centre (Ref 3988/1) - The word residential is included as an acceptable town centre use for new proposals

(b) Policy SG8: New Development and Business Improvement Districts

Support

Nazir Ahmed (Ref 755/30) - Support policy

Objection

Co-operative Group (Ref 254/7) - Schedule 15 provides very broad descriptions for development opportunities. Fails to elaborate on nature of acceptable retail development

at each location. Without detail the policy gives unqualified support retail development which is unacceptable.

Policy SG8.3 Main Street, Barrhead

Objection

Barrhead Community Council (Ref 924/4) - No details of proposals in plan, Community Council would appreciate details at an early date to allow consideration of impact on sheltered housing and salvation Army Centre.

Policy SG8.6 Greenlaw, Newton Mearns

Objection

Greenlaw Park Limited (Ref 775/5) - Amend New shopping development allocation to a mixed-use allocation incorporating retail, commercial and residential use. Modify Schedules 10, 12 and 13 to reflect this.

Policy SG8.10 Clarkston Town Centre

Objection

SEPA (Ref 70/49) - Assessment of flood risk required.

Policy SG8.12 Newton Mearns Town Centre

Objection

James Sandeman (Ref 600/15) - Requires date and targets to take BID seriously

Modification Stage

Objection

Mearns Cross Shopping Centre (Ref 3988/2) - The word residential is included as an example of acceptable complementary town centre uses.

(c) Policy SG9: Protecting the Retail Function of the Town and Neighbourhood Centres

Support

Nazir Ahmed (Ref 755/31) - Support policy

Objection

James Whyteside (Ref 82/13)

Council has already undermined retail by development at Greenlaw, Malletsheugh/Maidenhill would worsen situation.

James Sandeman (Ref 600/11)

Contradicts prioritising retail
Other uses cannot be ignored

Modification Stage**Objection**

Mearns Cross Shopping Centre (Ref 3988/3) - The word "existing" is included to remove ambiguity in the policy. New sites within a town centre should not have to comply with the four listed criteria. This policy is focused on change of use of existing retail units. It would not apply to undeveloped sites inside a town boundary and the inclusion of the word "existing" makes that clear.

Modifications sought by those submitting representations:**(a) Policy SG7: Town and Neighbourhood Centre Uses**

James Sandeman (Ref 600/10) - The Plan requires to be clearer on town centre uses.

Policy SG7.1 Barrhead

SEPA (Ref 70/44) - Flood risk assessment required.

Policy SG7.4 Newton Mearns

SEPA (Ref 70/45) - Flood risk assessment required.

Policy SG7.10 Sheddens, Eaglesham Road, Clarkston

SEPA (Ref 70/46) - Flood risk assessment required.

Policy SG7.16 Fenwick Road, Merrylee, Giffnock

SEPA (Ref 70/47) - Flood risk assessment required.

Policy SG7.26 Mearns Road, Newton Mearns

SEPA (Ref 70/48) - Flood risk assessment required.

Modification Stage**Mearns Cross Shopping Centre (Ref 3988/1)**

6.13.1 The town and neighborhood centres, as shown on the Proposals Map and listed in Schedule 14, will be the focus for new retail (Class 1 use), leisure, community, *residential* and other relevant, complementary uses in accordance with the sequential approach to site selection.

(b) Policy SG8: New Development and Business Improvement Districts

Co-operative Group (Ref 254/7) - Provide further detail on the specific opportunities, particularly scale of development.

Policy should be expanded to clarify what proposals will be subject to assessment under SG7.

Policy SG8.3 Main Street, Barrhead

Barrhead Community Council (Ref 924/4) - Details of proposals should be included in plan.

Policy SG8.6 Greenlaw, Newton Mearns

Greenlaw Park Limited (Ref 775/5)

Amend New shopping development allocation to a mixed-use allocation incorporating retail, commercial and residential use.

Policy SG8.10 Clarkston Town Centre

SEPA (Ref 70/49)

Flood risk assessment required.

Policy SG8.12 Newton Mearns Town Centre

James Sandeman (Ref 600/15)

Plan should include further details on Proposed BID.

Modification Stage

Mearns Cross Shopping Centre (Ref 3988/2) - 6.14.1 The Council will support new retail and complementary development (e.g. Residential) at the location shown on the Proposals Map and as listed in Schedule 15.

(c) Policy SG9: Protecting the Retail Function of the Town and Neighbourhood Centres

James Whyteside (Ref 82/13) - Deletion of Policy M2.1 Malletsheugh/Maidenhill Strategic Development opportunity.

James Sandeman (Ref 600/11) - Policy must allow for other uses in the Town and Neighbourhood Centres not just retail.

Modification Stage

Mearns Cross Shopping Centre (Ref 3988/3)

6.15.1. The Council seeks to protect the predominantly retail function (i.e. Class 1 use) of the town and neighbourhood centres. Proposals for change of use away from *existing* retail (Class 1 use) to non-retail at ground floor level within these centres will only be acceptable if it can be demonstrated that they comply with all of the criteria listed below:.....

Summary of responses (including reasons) by planning authority:**(a) Policy SG7: Town and Neighbourhood Centre Uses****Support****Co-operative Group (Ref 254/6), Nazir Ahmed (Ref 755/29)**

The Council acknowledges and welcomes the support for Policy SG7.

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

Objection**James Sandeman (Ref 600/10)**

Although the list of Town Centre uses is not in a priority order, it is recognised that the focus on Town Centres remains on promoting new retail opportunities. However, for Town Centres to remain vibrant and successful, leisure, community and other relevant complementary uses will be supported where appropriate to contribute to the role and function of the Centre. The Policy provides sufficient flexibility to allow for a wide range of uses to be developed in Town Centres.

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

Policy SG7.1 Barrhead Town Centre**Objection****SEPA (Ref 70/44)**

It is accepted that some areas within Barrhead Town Centre maybe be highlighted with the SEPA Indicative Flood Map. In the event proposals are forthcoming for areas within or adjacent to a flood zone a full flood risk assessment will be required prior to development. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals.

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

Policy SG7.4 Newton Mearns, Policy SG7.10 Sheddens, Eaglesham Road, Clarkston, Policy SG7.16 Fenwick Road, Merrylee, Giffnock**Objection****SEPA (Ref 70/45, 70/46, 70/47)**

When viewed against SEPA Indicative Flood Risk Map, it is noted that these established centres do not fall within or are within the vicinity of an identified area and therefore a Flood Risk assessment would not be required. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals.

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

Policy SG7.26 Mearns Road, Newton Mearns**Objection**

SEPA (Ref 70/48) - Mearns Road is a long established Neighbourhood Centre comprising a number of different active operators. SEPAs Flood Risk Maps reveal only a small section of the site within an area subject to flood risk. In the event proposals are forthcoming a full flood risk assessment will be required prior to development. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals.

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

Modification Stage**Objection****Mearns Cross Shopping Centre (Ref 3988/1)**

Scottish Planning Policy (SPP) indicates that Town Centres should be the focus for a mix of uses including retail, leisure, entertainment as well as homes and businesses. The Council acknowledges that homes have a role to play in the provision of a mix of complementary uses within town centres. In recognition of this the Council sees merit in including the word 'residential' after the word community in the Policy.

If the Reporter is so minded to recommend that the Representation from Inaltus Ltd is accepted and the Plan modified as below, the Council would be supportive of this modification because it would not have any implications for the wider area or other policies within the LDP.

The first sentence of 6.13.1 should read (additional text in italics):

The town and neighbourhood centres, as shown on the Proposals Map and listed in Schedule 14, will be the focus for new retail (Class 1 use), leisure, community, *residential* and other relevant, complementary uses in accordance with the sequential approach to site selection....'

In addition insert the following text in Paragraph 6.12.1 after the 4th sentence to read:

.....offer a range of other services and facilities. *Homes have a role to play in ensuring Town Centres remain successful places. New residential development of an appropriate scale will be supported where proposals do not result in a significant loss of retail frontage or floorspace and compliment the shopping function.*

(b) Policy SG8: New Development and Business Improvement Districts**Support**

Nazir Ahmed (Ref 755/30) - The Council acknowledges and welcomes the support for Policy SG8.

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

Objection**Co-operative Group (Ref 254/7)**

The detail nature and scale of each proposal are more appropriately outlined within Schedule 15 of the Action Programme (CD/07) in which each development proposal (SG8.1 to SG8.8) is individually referenced. The Development Management Process will ensure that proposals are appropriate to each particular location.

In addition it is acknowledged that some further clarification on the New Development Proposals outlined within Policy SG8 would be beneficial.

In order to provide clarity if the Reporter was so minded the Council would be supportive of modifying Policy SG8 as follows:.

Add 2nd sentence to para 6.14.1:

Proposals will be supported where of an appropriate scale and design quality, in order to contribute to the quality of the environment and the role and function of the centre.

Policy SG8.3 Main Street, Barrhead**General****Barrhead Community Council (Ref 924/4)**

Planning Consent (2012/0591/TP) (CD/88) was granted on 29th May 2013 for a new supermarket. Barrhead Community Council was formally consulted on the planning application and gave their support.

As part of the development management process there was consultation with the community on design matters including the creation of a civic square. This was a major planning application and consequently consultation sessions were arranged at Proposal Of Application Notice and thereafter following submission of the full planning application.

The Council can confirm that access arrangements to the sheltered housing and Salvation Army building remain intact and consequently it is anticipated that there will be little impact upon either of these buildings.

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

Policy SG8.6 Greenlaw, Newton Mearns**Objection****Greenlaw Park Limited (Ref 775/5)**

The remainder of this site has consistently been envisaged for retail development both in the Proposed Plan and the existing Local Plan. This site relates to the last remaining element of the Greenlaw retail offer. This site is considered appropriate to be retained for retail uses which would allow for expansion if required. In the event this site was developed for another use this flexibility would be lost.

An application from McCarthy and Stone (2013/0767/TP) has since been submitted seeking retirement housing on this site. No decision has yet been made. It is therefore recommended that this site be retained for retail development opportunities. Other sites have been identified in the Plan to meet housing needs as demonstrated under Issue 9.1.

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

Policy SG8.10 Clarkston Town Centre

Objection

SEPA (Ref 70/49)

Policy SG8.10 relates to the existing Business Improvement District at Clarkston, which is an initiative established by local businesses to promote Clarkston and improve trading conditions. When viewed against SEPA Indicative Flood Risk Map, it is noted that this centre does not fall within or within the vicinity of an identified flood zone and therefore a Flood Risk assessment would not be required.

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

Policy SG8.12 Newton Mearns Town Centre

Objection

James Sandeman (Ref 600/15)

The establishment of BID at Newton Mearns remains a key aspiration of the Council, however this proposals remains at an early stage. Therefore confirmation on date and targets cannot be given at this time.

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

Modification Stage

Objection

Mearns Cross Shopping Centre (Ref 3988/2)

The Council considers that it would be out of context to solely give one example of the range of uses which may be considered complementary development.

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

(c) Policy SG9: Protecting the Retail Function of the Town and Neighbourhood Centres

Support

Nazir Ahmed (Ref 755/31)

The Council acknowledges and welcomes the support for Policy SG9.

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

Objection**James Whyteside (Ref 82/13), James Sandeman (Ref 600/11)**

The Council has designed a suite of retail policies which cover both Town & Neighbourhood Centres (SG7, SG8 & SG9) which will help cater for the existing population and anticipated additional population associated with projected housing expansion within East Renfrewshire. Although Policy SG9 seeks to protect the retail function of centres, the policy framework is flexible to permit other uses subject to compliance with a range of criteria. It is recognised that for Town Centres to remain vibrant and successful, leisure, community and other relevant community uses can be supported where appropriate to contribute to the role and function of the Centre. A Neighbourhood Centre was provided at Greenlaw with a Waitrose store also delivered over recent years. The Development framework for the master plan area at Malletsheugh/Maidenhill (CD/21) (M2.1) clearly states that local scale retail development is to be provided. It is viewed that this scale of retail would not impact upon the vitality and viability of Newton Mearns Town Centre.

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

Modification Stage**Objection****Mearns Cross Shopping Centre (Ref 3988/3)**

The Council considers that it is unnecessary to add the additional word 'existing' to the text as this is self-evident for change of use applications which would be subject to the criteria contained within the policy.

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

Reporter's conclusions:**Town and Neighbourhood Centre Uses – Policy SG7**

1. I agree with the council that the policy provides sufficient flexibility to allow for a wide range of uses to be developed in town centres, but note that the council accepts that homes have a role to play in the provision of a mix of complementary uses, and sees merit in including the word 'residential' after the word 'community' in the policy. I accept that this explicit recognition of the role of residential use in town centres would be appropriate.

Flooding

2. The Scottish Environment Protection Agency has proposed that flood risk assessments should be required for development on a number of sites. Having regard to the Scottish Environment Protection Agency flood maps, these sites are affected to varying degrees. Policy E4 indicates that the council will resist development within areas that are at risk of flooding. It appears to me that this general policy would be sufficient where only a small part of an area allocated for development is at risk of flooding with an annual probability greater than 0.5 percent (1 in 200 years). Where, however, a substantial part of an area is at risk, this could impose a major constraint on development and I consider that the need for a flood risk assessment in such cases should be flagged

up in the relevant schedule of the plan. In extreme cases, all or most of an area could be at flood risk and any new development would be inappropriate. Some such sites, however, have existing development on them, and alterations or extensions should be subject to flood risk assessment to ensure the risk is not made worse.

3. Of the sites listed in Schedules 14 (Town and Neighbourhood Centres) and 15 (New Shopping Development), it appears to me that SG7.4 (Newton Mearns Town Centre), SG7.10 (Sheddens, Eaglesham Road, Clarkston), SG7.26 (Mearns Road, Newton Mearns) and SG8.10 (Clarkston Town Centre) have only very small areas subject to flood risk, and no change to the proposed plan is required for these. In SG7.1 (Barrhead Town Centre), a substantial part of the area, mainly at the western end, is liable to flooding. Much of this area is occupied by existing development. In SG7.16 (Fenwick Road, Merrylee, Giffnock), the entire area is at risk of flooding, and there is a historic flood record. Again, the area is largely built-up. In both these cases, I consider that the need for flood risk assessment should be indicated in the relevant schedule.

New Development and Business Improvement Districts – Policy SG8

4. As indicated by the council, further details of each proposal are provided in Schedule 15 of the Action Programme. I do not consider it necessary to repeat this information in Schedule 15 of the plan itself. However, the council acknowledges that some further clarification of Policy SG8 would be beneficial, and has proposed some additional wording (which already appears in Policy SG7). I agree that this would be a worthwhile improvement.

5. I agree with the council that it would be out of context to give just one example of the range of uses which may be considered complementary development such as residential. The proposed addition of 'residential' to Policy SG7 would make it clear that such development is considered appropriate in town centres, and I do not consider that any further modification is necessary.

Main Street, Barrhead

6. I note that planning consent was granted on 29 May 2013 for a new supermarket, and I understand that Barrhead Community Council was formally consulted on the planning application and gave support. An ASDA supermarket was nearing completion on the site at the time of my visit in August 2014. I am satisfied that the proposed plan does not require modification.

Greenlaw, Newton Mearns

7. It is argued that in the light of current market conditions, the 'retail only' allocation within the proposed plan is overly restrictive and would probably result in the land lying vacant in its current condition for an indeterminate amount of time. As with the nearby business development site (SG6.10 and SG6.20), the land has the rather unkempt appearance of an urban brownfield site and provides a somewhat dispiriting gateway to Newton Mearns for travellers arriving from the M77 at Junction 4. I note the council's view that the site should be retained for retail uses which would allow for expansion of the existing Greenlaw retail area if required, and I acknowledge that if it were developed for another use this flexibility would be lost. An application from McCarthy and Stone seeking retirement housing on this site has been withdrawn.

8. Policy SG8 supports new retail and complementary development at locations such as Greenlaw which already introduces a degree of flexibility. I do not consider that the policy is overly restrictive. Furthermore, the proposed plan provides sufficient housing land elsewhere, and there is currently no need to release any of this site for housing development. I consider that the allocation for new shopping development should be retained, while recognising that a retail-led development could contain elements of other complementary uses.

Newton Mearns Town Centre

9. The council has stated that this Business Improvement District proposal (SG8.12) remains at an early stage, and so confirmation on dates and targets cannot yet be given. I therefore consider it would not be appropriate to modify the proposed plan. In any event, these details would be better located in the Action Programme.

Protecting the retail function of the town and neighbourhood centres

10. The council points out that the development framework for the master plan area at Malletsheugh/ Maidenhill (M2.1) clearly states that only local scale retail development is to be provided. I agree that this scale of retail would be unlikely to impact on the viability of Newton Mearns Town Centre.

11. I agree with the council that although Policy SG9 seeks to protect the predominantly retail function of centres, the policy framework is flexible enough to permit other uses that contribute to vibrant and successful town and neighbourhood centres. I also agree with the council that it is unnecessary to add the word 'existing' to the third line of the policy. Existing retail use is self-evident for change-of-use applications which would be subject to the criteria contained within the policy.

Reporter's recommendations:

I recommend that the following modifications be made:

1. In paragraph 6.12.1 after the fourth sentence ending "offer a range of other services and facilities", insert new sentences: "Homes have a role to play in ensuring that town centres remain successful places. New residential development of an appropriate scale will be supported where proposals do not result in a significant loss of retail frontage or floorspace and complement the shopping function."
2. In the first sentence of paragraph 6.13.1, after "community", insert ", residential".
3. At the end of paragraph 6.14.1, insert: "Proposals will be supported where of an appropriate scale and design quality, in order to contribute to the quality of the environment and the role and function of the centre."
4. In Schedule 14, SG7.1, after "Barrhead" insert "**"
5. In Schedule 14, SG7.16, after "Fenwick Road, Merrylee, Giffnock", insert "**"
6. At the foot of Schedule 14 insert "* Development proposals will require to be subject to a flood risk assessment."

Issue 13	SUSTAINABLE TRANSPORT NETWORK	
Development plan reference:	Policy SG10: Sustainable Transport Network Schedule 17: Sustainable Transport	Reporter: Michael Cunliffe
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>James Whyteside (Ref 82/14) SEPA (Ref 70/51) (Ref 70/54) Scottish Natural Heritage (Ref 88/13) Bernard Kelly and Irene McCartney (Ref 92/1) Gordon Meeten, North Park Residents on behalf of 24 Signatories of SG10.5 Petition (Ref 105/1) Norman Graham (Ref 286/8) Cala Homes and Taylor Wimpey (Ref 378/4) Thornliebank Community Council (Ref 504/3) Lynda Murray (Ref 511/9) Neil Warren (Ref 578/5) (Ref 578/12) James Sandeman (Ref 600/12) Newton Mearns Community Council (Ref 686/8) Nazir Ahmed (Ref 755/32) W Clifford (Ref 881/1) Iain McCowan (Ref 896/10) SPT (Ref 969/5)</p> <p><u>Appendix 1 – Standard Letter</u> Standard Letter Comment SG10A (18 reps) (Ref 1024/1)</p>		
Provision of the development plan to which the issue relates:	Chapter 6 Sustainable Economic Growth Sustainable Transport Network – Para. 6.16.1-6.17.5 Policy SG10.13 M77/GSO, Newton Mearns Policy SG10.5 Glen Street, Barrhead Policy SG10.10: Neilston Train Station, Neilston Action Programme	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy SG10: Sustainable Transport Network</u></p> <p><u>Support</u></p> <p><u>Scottish Natural Heritage (Ref 88/13)</u> - We support Policy SG10: Sustainable Transport Network particularly that “Opportunities for improving the walking and cycling network, public transport and the health benefits of proposals will be key components of the master plans. “</p> <p><u>Neil Warren (Ref 578/12)</u> - Support reserving M77 as transport corridor and safeguarded from development</p> <p><u>Nazir Ahmed (Ref 755/32)</u> - Support policy</p>		

Newton Mearns Community Council (Ref 686/8)

Support paragraph 6.17.3, point 2, page 64, that the Glasgow Southern Orbital and the M77 be reserved as transport corridors and that they be safeguarded from development that could prejudice its ability to function

Support SG10.11 –Aurs Road realignment and J4 enhancement.

Objection

James Whyteside (Ref 82/14) - No explanation given as to how sustainable use of public transport has to be achieved.

Norman Graham (Ref 286/8) - Does not promote suburban rail network

Cala Homes and Taylor Wimpey (Ref 378/4)

Seeks to safeguard M77 and GSO as transport corridors - wish to reserve position fully to investigate access from site to GSO mindful that development of M77 is strategic priority. Bullet 2 of para 6.17.3, could prejudice development of Maidenhill site to consider several access alternatives

Para 175 of SPP renders the above point unnecessary

Thornliebank Community Council (Ref 504/3) - Public transport throughout council area is poor

Lynda Murray (Ref 511/9)

Policy does not promote and develop the suburban rail network as the preferred sustainable mass transit passenger system

Housing sites should be encouraged along suburban rail network

Neil Warren (Ref 578/5)

Policy does not sufficiently promote and develop suburban rail network as required under SDP

Carriageway should be increased on M77 southbound between J3 and 4

Development should be encouraged along rail network rather than M77

James Sandeman (Ref 600/12) - Object to Council support of SG10.3 and SG10.11/12

Newton Mearns Community Council (Ref 686/8)

Policy does not sufficiently promote and develop the suburban rail network as the preferred sustainable passenger mass transit system, in line with the transport objectives of the SDP.

SG10.3 Balgray link not sustainable and would not improve connectivity between Barrhead and M77.

Increase congestion at J5.

M77 already congested. Provide 3 lanes southbound J3-J4.

Development of housing sites should be encouraged along the suburban rail network.

Iain McCowan (Ref 896/10)

Does not sufficiently promote and develop suburban rail network

GSO and M77 should be safeguarded from development

M77 southbound carriageway should be made 3 lanes southbound

SPT (Ref 969/5)

Support clear emphasis on promoting sustainability
Reference to how travel plans are a key tool in changing behaviour towards more sustainable travel choices and provision of infrastructure and services.

Standard Letter Comment SG10A (18 reps) (Ref 1024/1)

Congestion at peak times currently in Newton Mearns
Reducing car use is unlikely due to limited public transport and residents mostly commuting out of area for work

(b) Policy SG10.13 M77/GSO, Newton Mearns**Objection**

SEPA (Ref 70/54) - Assessment of flood risk required.

(c) Policy SG10.5 Glen Street, Barrhead**Objection**

SEPA (Ref 70/51) - Assessment of flood risk required.

Bernard Kelly and Irene McCartney (Ref 92/1)

Impact on day to day lives
Currently quiet and secluded area, distressed that area will become noisy during construction with inconvenience caused by workmen and work vehicles
Will cause difficulty entering and exiting street
Objector works constant night shift rota and is likely to be disturbed - sound barrier should be erected
Plan detrimental to house value and clients wish compensation

**Gordon Meeten, North Park Residents on behalf of 24 Signatories of SG10.5
Petition (Ref 105/1)**

Object to development:
Impact on day to day lives in quiet secluded area
Concerned about noisy construction vehicles and workmen
Inconvenience to residents entering and exiting North Park Avenue
Greater flow of traffic in area
Impact on residents working shift patterns/night shift

(d) Policy SG10.10: Neilston Train Station, Neilston**Objection**

W Clifford (Ref 881/1) - Promotion of warehouse site as parking for 50-100 cars - 36 Station Road

Modifications sought by those submitting representations:**(a) Policy SG10: Sustainable Transport Network**

James Whyteside (Ref 82/14) - Plan should be clear as to how sustainable use of public transport has to be achieved.

Norman Graham (Ref 286/8), Lynda Murray (Ref 511/9), Neil Warren (Ref 578/5), Newton Mearns Community Council (Ref 686/8), Iain McCowan (Ref 896/10)

Policy should promote and develop the suburban rail network as the preferred sustainable mass transit passenger system.

Cala Homes and Taylor Wimpey (Ref 378/4) - Remove or amend bullet 2 para 6.17.3 to consider several access alternatives.

James Sandeman (Ref 600/12) - Deletion of proposals SG10.3 and SG10.11/12

Neil Warren (Ref 578/5), Newton Mearns Community Council (Ref 686/8), Iain McCowan (Ref 896/10) - Plan should include requirement to increase number of lanes on M77 between Junctions 3 and 4.

Newton Mearns Community Council (Ref 686/8) - Deletion of proposal SG10.3 Balgray link not sustainable.

Carol A Gilbert, SPT (Ref 969/5) - Reword 6.17.4 final bullet to include "maintain or increase patronage"

Standard Letter Comment SG10A (18 reps) (Ref 1024/1) - Housing development should not proceed without assessment of short term and long term effects of development on traffic.

(b) Policy SG10.13 M77/GSO, Newton Mearns

SEPA (Ref 70/54) - Flood risk assessment required.

(c) Policy SG10.5 Glen Street, Barrhead

SEPA (Ref 70/51) - Flood risk assessment required.

Bernard Kelly and Irene McCartney (Ref 92/1), Gordon Meeten, North Park Residents on behalf of 24 Signatories of SG10.5 Petition (Ref 105/1)

Deletion of proposal SG10.5 Glen Street.

If Proposal goes ahead it would require sound barrier to minimise disturbance.

Compensation for loss of house value required.

(d) Policy SG10.10: Neilston Train Station, Neilston

W Clifford (Ref 881/1) - 36 Station Road should be allocated within Schedule 17 as parking for 50-100 cars.

Summary of responses (including reasons) by planning authority:**(a) Policy SG10 – Sustainable Transport Network****Support**

Scottish Natural Heritage (Ref 88/13), Nazir Ahmed (Ref 755/32) - The Council acknowledges and welcomes the support for Policy SG10.

Neil Warren (Ref 578/12), Newton Mearns Community Council (Ref 686/8)

Support for Para 6.17.3 and Proposal SG10.11 is noted.

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

Objections

James Whyteside (Ref 82/14) Norman Graham (Ref 286/8), Thornliebank Community Council (Ref 504/3), Lynda Murray (Ref 511/9), Neil Warren (Ref 578/5), Newton Mearns Community Council (Ref 686/8), Iain McCowan (Ref 896/10), Standard Letter Comment SG10A (18 reps) (Ref 1024/1)

Policy SG10: Sustainable Transport Network provides the policy framework in support of a sustainable transport network that supports the economy and meets the development needs of the area through to 2025 and beyond. Schedule 17: Sustainable Transport details the key infrastructure projects that the Council supports. Opportunities for improving the walking and cycling network and public transport are fully explored in line with Scottish Government advice in Designing Streets (CD/80) and Designing Places (CD/79) in the master plan areas as demonstrated under Issues 3.3-3.5 and within the Development Frameworks (CD/21) (CD/22) and (CD/23). SPT and Transport Scotland have been fully involved in the preparation of the Plan and the Development Frameworks. The Council will also ensure reflection of the themes and key messages from the national, regional and local transport Strategies. As para 5.1.2 states, the Council also intends to prepare a future SPG and this will inform future proposals.

Roads Infrastructure has been raised as an issue, largely around congestion on the M77, impact on local roads, increase in use of cars and higher trip generation to schools, shops and local facilities. Whilst the Council accepts that the residential and other uses proposed will inevitably result in increased pressure on local roads, there has been no hard evidence submitted to the Council by respondents that quantify this and no evidence that the effects cannot be mitigated in an acceptable manner. P57 of the Action Programme makes it clear that major proposals require to be accompanied a transport statement and/or travel plans. An assessment of the impact of new development on local roads and junctions is therefore undertaken as part of the development management process and mitigation measures, and if necessary would be funded by the developers. As demonstrated under issues 3.3-3.5 Transport assessments will form an integral component of the master plan areas.

The Proposed Plan places strong emphasis on measures to decrease the use of private cars, the encouragement of public transport networks and a strong green network incorporating cycle and pedestrian routes. There has been active partnership working with SNH, SPT and GCV Green Network Partnership to ensure these principles are firmly embedded within the Plan and this will be re-emphasised through the Development Frameworks and any Development Briefs. However, the planning system can only go so

far and a shift in people's attitudes to using the car less is also required.

Schedule 17 identifies there are improvements proposed to some park and ride facilities at local railway stations together with a new railway station at Springfield, Barrhead (SG10.4). Funding was provided by SPT for a new park and ride facility at Neilston Station which gained planning consent 2013. The Council does recognise that a realistic approach is required in respect of funding for all major rail improvements. All options and sources will continue to be investigated.

Para 6.17.3, bullet point 3 fully deals with the location of new development. The Site Evaluation (CD/09), as amended utilising advice from SPT (CD/10), the SEA (CD/06) and Green Belt review have been integral in identifying sites for inclusion in the Plan. It is recognised that not all sites are within a walking distance of a rail station. However, as detailed above improvements to the public transport network is a key aspect of the Plan and master plan areas. It is not always possible to locate sites adjacent to rail stations, however, the sites at Hillfield and Barcapel are in close proximity to Patterton Station and a new rail station is proposed at Barrhead South master plan area.

A number of points stated that carriageways on the M77 should be increased. The M77 is a trunk road and therefore the responsibility of Transport Scotland and not under the influence of the Council. The Council has no powers to increase the carriageways on the M77.

Cala Homes and Taylor Wimpey (Ref 378/4)

The Council recognises that Para. 175 of SPP states that new junctions onto the motorway and trunk network are not normally acceptable unless significant economic growth or regeneration benefits can be demonstrated. The Council does not believe that bullet 2, para 6.17.3 would prejudice a potential access point from/to the Glasgow South Orbital (GSO) from the Malletsheugh/Maidenhill master plan area. Such an option is being explored within the Strategic Transport Assessment (CD/) for the master plan area which will form part of the access strategy for the site.

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

**James Sandeman (Ref 600/12), Newton Mearns Community Council (Ref 686/8);
Iain McCowan (Ref 896/10)**

Policy M2.2 required the master plan process to investigate the Balgray Link route as part of the sustainable transport strategy for the site. The Balgray Link was not a justification for the release or an essential requirement of the master plan. The infrastructure requirements and development viability consideration of the development framework has identified that the Balgray Link is not required to realise the development of the site and that the cost implications would have been prohibitive to delivering a viable development. Whilst the improvements of connectivity between Barrhead and Newton Mearns remains a Council aspiration and the Balgray Link Route retains the support of the Council it will not be pursued as an integral part of this site. It will remain within the Plan but the Council is seeking to amend the Action Programme to reflect that it will be a long term aspiration, the implementation of which will be sought from alternative funding sources. Development contributions will not be sought towards the cost of this proposal.

In order to provide recognition and clarity of the longer term nature of the Balgray Link Road and if the Reporter is so minded the Council would be supportive of the Action Programme being modified accordingly.

SPT (Ref 969/5)

Support for the emphasis on sustainability is acknowledged and welcomed. SPT requested a change to 6.17.4 final bullet. However, it is believed that this should refer to the final bullet point of 6.17.3 (not 6.17.4). The Council agrees with this representation.

If the Reporter is so minded the suggested additional text set out below by the respondent should be added to the final bullet of 6.17.3. The Council would be supportive of this modification because it would not have any implications for the Strategy or other policies within the LDP.

Final bullet point under 6.17.3 to read (additional text in italics):

“Prioritise improvements to public transport including the need for enhancements to bus and rail infrastructure and services to *maintain or* increase patronage within the area”

SPT has also requested that more emphasis is added to the Action Programme in respect of monitoring and enforcing Travel Plans. The process of monitoring and enforcing Travel Plans will continue to be investigated.

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

(b) Policy SG10.13 –M77/GSO, Newton Mearns – Motorway Service Area**SEPA Ref 70/54**

When viewed against SEPA Indicative Flood Risk Map, it is noted that this site does not fall within or are within the vicinity of an identified area and therefore a Flood Risk assessment would not be required. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals.

The Council disagrees with this objection.

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

(c) Policy SG10.5: Glen Street Barrhead**Bernard Kelly and Irene McCartney, Ref 92/1, Gordon Meeten, North Park Residents on behalf of 24 signatories of SG10.5 petition, Ref 105/1**

The concerns of residents are noted and recognised. The details of any application for the new road would be fully explored and assessed at a planning application stage through the development management process. Property values are not a material consideration in assessment of applications.

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

(d) Policy SG10.10: Neilston Train Station, Neilston**W Clifford (Ref 881/1)**

The Council notes the respondent’s comments. A recent planning application, (2013/0343/TP) was approved for improved Park and Ride facilities at Kingston Road,

Neilston. This use will be monitored and an assessment reached on the requirement for further additional parking. This will be reviewed through the Action Programme and reviews of the LDP. It is not considered that additional parking is required at this time.

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

Reporter's conclusions:

Public transport

1. I note the representations which question the extent to which the proposed plan promotes the use of public transport, and in particular the suburban rail network. Scottish Planning Policy sets out in paragraphs 272 to 285 the requirements that development plans should satisfy. In particular, the spatial strategies set out in plans should support development in locations that allow walkable access to local amenities and are also accessible by cycling and public transport. Plans should identify active travel networks and promote opportunities for travel by more sustainable modes in the following order of priority: walking, cycling, public transport, cars.

2. In my view, the proposed plan is consistent with these requirements. The choice of development locations has to take account of a number of factors, and while accessibility to public transport is an important one of these, it has to be balanced against other requirements. Proximity to railway stations, while desirable, cannot always be the decisive factor. Policy SG10: Sustainable Transport Network contains a number of elements designed to promote greater use of public transport, and the council has stated its commitment to ensure that the master plans for strategic development sites also reflect the need for good access to sustainable transport modes. I note that the council would be supportive of a modification to Policy SG10 proposed by Strathclyde Passenger Transport to amend the final bullet point under 6.17.3 to read "Prioritise improvements to public transport including the need for enhancements to bus and rail infrastructure and services to maintain or increase patronage within the area". I agree that this modification should be made.

Road corridor safeguarding

3. Paragraph 278 of Scottish Planning Policy states that while new junctions on trunk roads are not normally acceptable, the case for a new junction will be considered where the planning authority considers that significant economic growth or regeneration benefits can be demonstrated and where there would be no adverse impact on road safety or operational performance. In my view, there is nothing in the second bullet of paragraph 6.17.3 of the proposed plan that would preclude access from Maidenhill to the Glasgow South Orbital if the requirements set out in Scottish Planning Policy were satisfied. I do not therefore consider that there is any need to modify the proposed plan in the light of the representations.

M77 upgrading

4. Representations propose an increase in the number of southbound lanes on the M77 between Junctions 3 and 4. However, the motorway is not a council responsibility. Any change to its layout is a matter for Transport Scotland, and unless additional land were required it would not affect the proposed plan.

Balgray Link Road

5. Policy M2.1: M77 Strategic Development Opportunity - Malletsheugh/Maidenhill, Newton Mearns includes a requirement for the master plan to investigate improvements to connectivity between Barrhead and Newton Mearns including the 'Balgray Link' route. This is repeated in Policy M2.2: M77 Strategic Development Opportunity - Barrhead South – Springhill, Springfield, Lyon Cross. Schedule 17: Sustainable Transport includes SG10.3 Balgray Link – Balgraystone Road, Barrhead to J5/M77 - improvements to connectivity between Barrhead and Newton Mearns. Representations maintain that a Balgray Link road would not be sustainable, and seek its deletion from the proposed plan.

6. The council has responded that the Balgray Link was not a justification for the release of strategic development sites and is not required to realise their development. Improvement of connectivity between Barrhead and Newton Mearns remains a council aspiration for the longer term. The council is seeking to amend the Action Programme to reflect this. I agree that the long-term nature of the proposal should be clarified, but amendments to the Action Programme are not within my remit. I consider, however, that Schedule 17 also requires to be modified to make it consistent with Policies M2.1 and M2.2, which contain requirements to investigate (my emphasis) improvements to connectivity between Barrhead and Newton Mearns including the 'Balgray Link' route, whereas Policy SG10.3 presents the Balgray Link as a firm proposal. It might well turn out that the investigations could find that such a link would not be justified, and the tentative nature of the concept should be made clearer in Schedule 17.

Aurs Road realignment and M77 Junction 4 enhancement

7. James Sandeman (Ref 600/12) questions the inclusion in Schedule 17 of both SG10.3 (Balgray Link) and SG10.11/12 (Aurs Road, Newton Mearns and M77 Junction 4 enhancement). While the council has clarified that the Balgray Link is to be pursued in the longer term, it has not commented on the Aurs Road/Junction 4 aspect of the representation. However, it appears to me that for road safety reasons the realignment of Aurs Road as shown on the Proposals Map is a necessary improvement. I note that both this proposal and the improvement of M77 Junction 4 are supported by Newton Mearns Community Council. I do not consider that any modification of the proposed plan is required in relation to these proposals.

Policy SG10.13 – M77/GSO, Newton Mearns – Motorway Service Area

8. The site does not fall within an area identified on the Scottish Environment Protection Agency flood map as being at risk of flooding with an annual probability of 0.5 per cent (1 in 200 years) or greater. There is therefore no need to modify the proposed plan.

Policy SG10.5 - Glen Street, Barrhead

9. Policy SG10.5 proposes the realignment of Glen Street, Barrhead and construction of a new relief road linking to Cross Arthurlie Street. This would be the second phase of a road improvement first proposed in 2005 as part of the Barrhead Regeneration Framework, and subsequently incorporated into the adopted local plan. The first phase of the scheme was constructed in 2008, and provides access to the new ASDA supermarket. Policy SG10.5 is the subject of two sets of representations. The first is from the Scottish Environment Protection Agency and argues that the proposal should be subject to a flood risk assessment. The second is from local residents who are

concerned about the impact of the new road on residential amenity, both in construction and use, particularly in terms of noise.

10. The proposal would involve constructing a new bridge across the Levern Water and a new section of road running along, or close to, the flood plain on the north bank. Much of the land required is shown on the Scottish Environment Protection Agency flood map as being at risk of flooding with an annual probability of 0.5 percent or greater (1 in 200 years), and I consider that a flood risk assessment would be essential to ensure that the new road was not itself exposed to flooding and did not increase the risk of flooding elsewhere. The need for such an assessment should therefore be shown in Schedule 17.

11. I requested further information from the council on the question of noise. It does not appear that any noise impact studies have yet been carried out. The council's view is that any noise assessment and mitigation measures would most appropriately be considered as part of the planning application process for the new road. The council points to Strategic Policy 2: Assessment of Development Proposals, and Policy D1: Detailed Guidance for All Development as providing the policy context for considering impacts on air quality and residential amenity. However, inclusion of the proposal in the adopted local development plan would establish the principle of a new road on the alignment shown on the Proposals Map, and it might then be difficult to argue at the planning application stage that a road on that alignment should not proceed.

12. It appears to me that the main impact would be on residents of North Park Avenue, whose homes are on an elevated site facing the new road route across the Levern Water. In view of the height difference it could prove difficult to implement noise reduction measures such as fences or bunds that would reduce noise levels without themselves having significant effects (visual and daylight) on residential amenity. I consider it essential that a noise assessment is carried out before the proposal reaches the stage of a planning application, and that the scheme should proceed only if acceptable residential noise levels can be achieved, with the use of mitigation measures if necessary. Policy SG10.5 should therefore be modified to require a noise assessment as well as a flood risk assessment.

Policy SG10.10 - Neilston Train Station, Neilston

13. The council draws attention to the approval in 2013 of a planning application for improved park and ride facilities at Kingston Road, Neilston, and states that its use will be monitored and an assessment reached on the requirement for further additional parking. The new car park is now open and in use. When I visited on a weekday afternoon, there appeared to be several empty spaces. I do not consider that there is any need to modify the proposed plan to include an additional site at 36 Station Road.

Reporter's recommendations:

I recommend that the following modifications be made:

1. Policy SG10, paragraph 6.17.3, amend the final bullet point to read:
"Prioritise improvements to public transport including the need for enhancements to bus and rail infrastructure and services to maintain or increase patronage within the area".
2. In Schedule 17, SG10.3, amend the entry in the third column to read:
"Investigate improvements to connectivity between Barrhead and Newton Mearns (long

term) (Policy M2, M2.1 and M2.2).”

3. In Schedule 17, SG10.5, in the first column after “SG10.5” insert: “**”.

4. In the Notes at the foot of Schedule 17, insert: “**Subject to assessments of flood risk and residential noise impact”.

Issue 14	RENEWABLE ENERGY	
Development plan reference:	Policy E1: Renewable Energy	Reporter: Dilwyn Thomas
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>James Whyteside (Ref 82/15) Scottish Natural Heritage (Ref 88/1) Coriolis Energy Ltd (Ref 99/2) (Ref 99/4) Norman Gray (Ref 214/3) Margaret Gray (Ref 231/5) RSPB Scotland, South and West Region (Ref 280/10) Scottish Renewables (Ref 404/1) Scottish Government (Ref 496/1) Andrew Gray (Ref 501/6) Mr and Mrs D J Bain (Ref 589/1) Kate Makrides (Ref 706/3) Nazir Ahmed (Ref 755/33) Scottish Natural Heritage (Ref 964/5)</p>		
Provision of the development plan to which the issue relates:	Chapter 7: Managing the Wider Environment Para. 7.1 – 7.2.3 Policy E1.1 Broad Areas of Search	
Planning authority's summary of the representation(s):		
<p><u>Policy E1: Renewable Energy</u></p> <p><u>Support</u></p> <p><u>Margaret Gray (Ref 231/5)</u> For the benefit of future generations accept the need for RE but not in favour of haphazard turbines in landscape. Encouraged by plans shown in Key Diagram of sitting turbines in specific areas.</p> <p><u>Nazir Ahmed (Ref 755/33)</u> - Support policy</p> <p><u>Objections</u></p> <p><u>James Whyteside (Ref 82/15)</u> Energy from waste not renewable energy. Energy used to create waste not recovered and the waste itself is not renewable or sustainable. It is notable that the Council's preferred definition of 'renewable energy' in the Appendix II Glossary would allow nuclear energy to be classified as such.</p> <p><u>Scottish Natural Heritage (Ref 88/1)</u> Amend Para 7.2.2 to clarify policy wording to prevent confusion about what is shown on the Proposals Map the current wording suggests both the Broad Areas of Search and the areas of potential constraint are shown on the proposals map whereas only the Broad</p>		

Areas of Search is shown. Potential constraints are not mapped and only discussed within the Supplementary Planning Guidance.

Coriolis Energy Ltd (Ref 99/2) (Ref 99/4)

(Ref 99/2) Agree with SNH on wording of policy

(Ref 99/4) The LDP does not provide a spatial framework for onshore windfarms over 20MW as directed by SPP

Norman Gray (Ref 214/3) - Development of more wind farms will result in loss of amenity and scarring of the environment and contribute little to the economy.

RSPB Scotland, South and West Region (Ref 280/10) - Welcome reference to renewable energy developments in appropriate locations. We suggest that reference is also made to renewable energy developments of an appropriate scale as the Scottish Governments Electricity Generation Policy Statement supports biomass 'at a scale appropriate to make best use of both the available heat, and of local supply'.

Scottish Renewables (Ref 404/1) - Greater level of detail in development plan rather than in Supplementary Guidance in line with SPP

Andrew Gray (Ref 501/6) - Not in favour of further wind turbine development. Unproven source of renewable energy and have a negative effect on tourism. Tidal is more effective. Support proposals to contain turbines in certain areas.

Mr and Mrs D J Bain (Ref 589/1)

Object to visual impact of Neilston wind farm

Environmental impact of wind farms not considered seriously enough

Object that meeting European targets more important than environs of Scotland

Kate Makrides (Ref 706/3) - Object to incinerator.

Scottish Natural Heritage (Ref 964/5) - We appreciate that the purpose of this policy is to direct renewable energy developments to an area of search where it may be possible to develop such proposals with a lesser degree of environmental impact than projects in more sensitive areas. Nonetheless, where ever commercial scale wind turbines are installed it will give rise to significant landscape change locally. As a result, it is SNH's advice that this should be recognised by the assessment and the landscape impacts deemed negative in the table, albeit that the policy greatly reduces the extent of negative impacts to East Renfrewshire's wider landscape character and supports other environmental objectives.

Policy E1.1 Broad Areas of Search

Objection

Scottish Government (Ref 496/1)

Broad Areas of search not compliant with SPP paras 189 to 191

SPP makes no provision for landscape capacity sensitivity groupings or buffer zones around individual dwellings to be used to exclude land from areas of search. Whilst such matters may well be considerations at the development management stage, they should not be used to limit areas of search. Notably when considering these matters at the planning application stage there may be scope to mitigate through detailed sitting and

design. Similarly, noise, visual and other impacts on dwellings may be capable of mitigation through detailed siting, design and controls over conditions of use. We have commented separately on the Renewable Energy Supplementary Guidance, and requested that the Council rework the areas of search along the lines set out in SPP. But a consequence of this for the Proposed Plan itself should be a redrawing of the areas of search as shown on the Proposals Map.

Modifications sought by those submitting representations:

Policy E1: Renewable Energy

James Whyteside (Ref 82/15) - Deletion of energy from waste from policy as not renewable energy.

Scottish Natural Heritage (Ref 88/1)

Amend Para 7.2.2 to clarify policy wording as follows:

Para 7.2.2 "Broad areas of search are shown on the Proposals Map. Further information on the Broad Areas of Search as well as details of areas of potential constraint and the range of criteria against which all the applications will be considered against are contained within the Renewable Energy Supplementary Planning Guidance".

Coriolis Energy Ltd (Ref 99/2) (Ref 99/4)

Para 7.2.2 states "Broad Areas For Search" Proposals Map lists "Broad Areas Of Search" suggest 'of' is used.

Para 7.2.2 "renewable energy" too generic replace with "wind energy"

Inclusion of spatial framework for onshore windfarms over 20MW.

RSPB Scotland, South and West Region (Ref 280/10) - Policy should refer to renewable energy developments of an appropriate scale.

Scottish Renewables (Ref 404/1) - There should be greater level of detail in the plan rather than in Supplementary Guidance.

Scottish Natural Heritage (Ref 964/5) - SEA Table 3 should be altered to ensure that landscape impacts for E1 are marked as negative in the table.

Policy E1.1 Broad Areas of Search

Scottish Government (Ref 496/1) - Rework the areas of search on the Proposals Map in accordance with SPP.

Summary of responses (including reasons) by planning authority:

(a) Policy E1 Renewable Energy

Support

Margaret Gray (Ref 231/5), ER Mosque & Community Centre (Ref 755/33)

The Council acknowledges and welcomes the support for Policy E1.

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

Objections**Norman Gray (Ref 214/3), Andrew Gray (Ref 501/6), Mr & Mrs D J Bain (Ref 589/1), Kate Makrides (Ref 706/3)**

The Council has attempted to ensure that the Local Development Plan policy accords with Scottish Planning Policy (CD/69), Scottish Government and Scottish Natural Heritage advice together with the approved Glasgow and Clyde Valley Strategic Development Plan (SDP) (CD/81).

The policy sets out a range of criteria for considering large and small scale windfarm proposals and other renewable energy developments. Broad Areas of Search, refined from the more general areas shown in the SDP, are detailed on the Proposals Map to help identify areas which may be suitable in principle for large scale windfarm developments.

The policy aims to take account of the cumulative effect of proposals in relation to existing wind farms and turbines. The emphasis of the policy is therefore on providing a positive framework and promoting renewable energy schemes in the right location. More detailed guidance is included in Supplementary Planning Guidance (SPG) on Renewable Energy that has been prepared by the Council.

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

James Whyteside (82/15)

Para 182 of SPP states support for energy from waste technologies as a renewable source and their inclusion in Policy E1 is considered appropriate. Nuclear Energy is not identified in SPP as a Renewable Energy source and the Council does not consider that nuclear energy should be considered within this category.

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

Scottish Natural Heritage (88/1), Coriolis Energy Ltd (99/4)

The Council agrees with the rewording of Para 7.2.2. However, it is not viewed necessary to include change 'renewable energy' to 'wind energy'.

If the Reporter is so minded the suggested additional text set out below by the representations should be added to the Plan. The Council would be supportive of this modification because it would not have any implications for the Strategy or other policies within the LDP.

Para 7.2.2 should read (additional text in italics):

Broad Areas of Search are shown on the Proposals Map. Further information on the Broad Areas of Search as well as details of areas of potential constraint and the range of criteria against which all the applications will be considered against are contained within the Renewable Energy Supplementary Planning Guidance.

Scottish Renewables (404/1), Coriolis Energy Ltd (Ref 99/4)

The Council considers that the format of the Proposed Plan is in accordance with the requirements of the Scottish Planning legislation and SPP and that the Supplementary Planning Guidance Renewable Energy is the correct document to contain detailed information and guidance.

There is broad Policy reference and Broad Areas of Search contained within the Proposed Plan which provides a spatial framework. The methodology relating to this and further Policy information is contained within the associated Supplementary Planning Guidance.

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

RSPB Scotland (280/10)

Large scale wind energy development is directed to the Broad Areas of Search and it is not intended to provide further guidance in relation to the scale of development at this time. The Council, together with its other local authority partners are currently participating in a study to establish the capacity of the landscape across the Glasgow and Clyde Valley region to accommodate future wind energy development. The outcome of this may lead the Council to produce further guidance on the scale of development. Issues of size and scale would be considered at the detailed planning application stage.

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

Scottish Natural Heritage (964/5)

It is agreed that SEA Table 3 should be altered to ensure that landscape impacts for E1 are marked as negative in the table.

It is recommended the SEA Table 3 is modified as above.

Policy E1.1 Broad Areas of Search

Objection

Scottish Government (496/1)

The Broad Areas of Search contained in the SDP have been refined using methodology which is set out in the proposed Wind Energy Search Area detailed in the Supplementary Planning Guidance: Renewable Energy and supported by the Wind Energy Study Technical Document (CD/43). This represents the Council's view on the areas with most potential for wind farm development in excess of 20 megawatt generating capacity taking into consideration local issues.

SPP indicates that in setting out a spatial framework for windfarm development of over 20 megawatts generating capacity, a number of factors should be considered. It refers to the need to identify areas requiring significant protection where cumulative impact of existing and consented wind farms limits further development.

Scottish Government has questioned the identification of landscape sensitivity groupings, however the Council considers that the decision to assess the capacity of the local landscape to accommodate new development is appropriate and in doing so has produced Broad Areas of Search which provide a clear direction in relation to capacity and the opportunity for future development.

The decision to include a 500m buffer around individual dwellings reflects an industry standard and provides clarity on the Council's position in relation to local impact.

It is the Council's recommendation that no alterations to the boundaries of the Broad Areas of Search as shown on the Proposals Map, however the keys on all the Proposals Maps should be altered to state that the hatched areas refer to the Broad Areas of Search.

In order to provide clarity if the Reporter was so minded the Council would be supportive of modifying the Proposals Map to state that the hatched areas refer to the Broad Areas of Search.

Reporter's conclusions:

Policy E1 in the proposed local development plan, and the revised Policy E1 proposed by the planning authority

1. Policy E1 in the proposed plan states:

"7.2 Policy E1: Renewable Energy

7.2.1 The council will generally support renewable energy proposals, including micro-renewable energy technologies on individual properties, wind turbine developments, hydro electric, biomass and energy from waste technologies in appropriate locations. Where appropriate, the applicant will be required to submit satisfactory mitigation measures to alleviate any adverse environmental impacts.

7.2.2 Broad areas for search and the areas of potential constraint for renewable energy are shown on the proposals map and referred to in the renewable energy supplementary planning guidance together with a range of criteria against which all applications will be considered.

7.2.3 Further detailed information and guidance is provided in the renewable energy supplementary planning guidance."

2. The supporting text in the local development plan for Policy E1 is set out at paragraphs 7.1.1-7.1.4. The proposals map identifies 6/7 broad areas of search for renewable energy, all to the east of the M77, and close to or on the southern and south eastern boundaries of the council's administrative area.

3. Shortly after the examination commenced, Scottish Planning Policy (2014) was published. This set out a new approach on spatial frameworks for onshore wind farms. It also includes considerations which are likely to be taken into account in assessing energy infrastructure development proposals. In response to a further information request, the planning authority indicated that it proposed a revised Policy E1. No change is proposed to paragraph 7.2.1 of the policy. The revised policy states:

"7.2 Policy E1: Renewable Energy...

...7.2.2 Broad areas of search for wind energy are shown on the proposals map and referred to under Schedule 18 and the renewable energy supplementary planning guidance, which also details the areas of potential constraint and the range of criteria against which all wind energy applications will be considered.

7.2.3 Further detailed information and guidance on a range of renewable energy technologies is provided in the renewable energy supplementary planning guidance.”

4. The planning authority proposes changes to the proposals map and Schedule 18 of the proposed plan to ensure that they reflect the terms of Scottish Planning Policy (2014). It also intends to restructure and revise the content and detail of the renewable energy supplementary planning guidance.

The background to Policy E1 in the proposed plan

5. The approach in the proposed plan is based on the now superseded 2010 Scottish Planning Policy, which indicated that planning authorities should support the development of a diverse range of renewable energy technologies, guide development to appropriate locations, and provide clarity on the issues that will be taken into account when specific proposals are assessed. It focussed on wind energy, and indicated that planning authorities should support the development of wind farms in locations where the technology can operate efficiently and environmental and cumulative impacts can be satisfactorily addressed. It stated that development plans should provide a clear indication of the potential for development of wind farms of all scales, and that they should set out the criteria that would be considered in deciding applications. It also indicated that the development plan should set out a spatial framework for onshore wind farms of over 20MW, which could include wind farms of less than 20MW, if that was considered appropriate. The framework should identify areas requiring significant protection, areas with potential constraints, and areas of search.

6. The draft 2013 Scottish Planning Policy maintained the 2010 Scottish Planning Policy's support for a mix of energy generation installations and supply infrastructure at appropriate locations. For wind energy, it indicated that strategic development plans should identify capacity for strategic onshore wind farms as well as cumulative impact pressures, and that local development plans should clearly set out the potential for wind turbine and wind farm development of all scales as part of a spatial framework. A framework should be based on 4 groupings: (1) areas where wind farms would not be acceptable; (2) areas of significant protection [wind farms would only be appropriate where it could be demonstrated that any significant effects on the qualities for which the area was identified could be substantially overcome by siting, design or mitigation]; (3) areas where planning constraints were less significant, where opportunities for wind farm development could be realised through good design or mitigation; and (4) areas where wind farms were likely to be supported subject to detailed consideration against policy. Under this guidance, plans should recognise that with the exception of group (1), the existence of planning constraints would not impose a blanket restriction.

7. The 2012 Glasgow and Clyde Valley Strategic Development Plan states that the city region is characterised by significant potential for wind energy. It sets out (at diagram 16) broad areas of search, and indicates that these provide a strategic spatial framework for more detailed local development planning. In refining their strategy, authorities are required to distinguish those areas outwith the broad areas of search which require significant protection from those with potential constraints. Strategy Support Measure 9 explains, amongst other things, that it will be for local development plans to take forward the refinement of the areas of search to establish their long term potential.

8. The adopted 2011 East Renfrewshire Local Plan identified a potential area of search for wind farms over 20MW. It was located along the council's southern boundary, running

from its south eastern corner, to the south of Eaglesham, Newton Mearns, Barrhead and Neilston, up to a point east of Uplawmoor. Policy E15 indicated that wind farms over 20 MW would be supported in principle in this area, and that the planning authority would carry out a more detailed landscape character assessment to help evaluate the impact of any future development proposals. While the potential search area was predominantly covered by a countryside around towns designation, its westernmost part extended into the green belt. Policy E15 contained 8 criteria which the planning authority would have particular regard to when assessing all renewable energy schemes.

9. The 2012 East Renfrewshire Wind Energy Study seeks to identify broad areas of search for wind farms over 20MW in a study area based on the potential search area shown in the adopted local plan and the area covered by the countryside around towns designation. The study area excludes the green belt. Following a landscape assessment, which takes into account landscape character and sensitivity, and cumulative impact, areas with higher and lower landscape capacity for wind farms have been identified. Other constraints have also been identified, including 500 metre buffer zones around residential properties.

10. The 2012 proposed supplementary guidance refers to the national energy policy context, and sets out the planning authority's wind energy guidance, which includes a spatial strategy for wind farms over 20MW based on the findings of the 2012 wind energy study. It also sets out 7 criteria for assessing renewable energy schemes, and briefly considers other technologies. The areas of no significant constraints highlighted in the wind energy study become a wind energy search area in the proposed supplementary guidance, and broad areas of search for renewable energy on the proposals map in the proposed plan. These areas, even when taken together, are significantly smaller than the potential search area shown in the adopted local plan.

Scottish Planning Policy (2014)

11. This replaces the 2010 Scottish Planning Policy and indicates that development plans should seek to ensure that an area's full potential for electricity and heat from renewable sources is achieved, in line with national climate change targets, giving due regard to relevant environmental, community and cumulative impact considerations. Local development plans should set out the factors to be taken into account in considering proposals for energy developments. These would be likely to include the following factors listed in paragraph 169: net economic benefits; the scale of contribution to renewable energy targets; effect on greenhouse emissions; cumulative impacts; impacts on communities and individual dwellings; landscape and visual impacts; effects on the natural heritage, hydrology, the water environment, and flood risk; impacts on carbon rich soils, public access, the historic environment, tourism and recreation, aviation, defence interests and seismological recording, telecommunications and broadcasting installations, road traffic and adjacent trunk roads; the need for conditions relating to decommissioning and robust planning obligations for achieving site restoration; and opportunities for energy storage.

12. Scottish Planning Policy (2014) explains that planning authorities should set out in the development plan a spatial framework identifying those areas that are likely to be most appropriate for onshore wind farms, following the approach set out in table 1, and indicating the minimum scale of development that the framework is intended to apply to. Table 1 divides the spatial framework into 3 groupings: (1) areas where wind farms will not be acceptable (National Parks and National Scenic Areas); (2) areas of significant

protection (national and international designations; other nationally important mapped environmental interests; and community separation (an area around cities, towns, and villages identified in the local development plan); and (3) areas with potential for wind farm development (beyond groups (1) and (2), wind farms are likely to be acceptable, subject to detailed consideration against identified policy criteria). This approach requires to be followed in order to deliver consistency nationally. Additional constraints should not be applied at this stage.

13. Scottish Planning Policy (2014) indicates that development plans should identify areas capable of accommodating renewable electricity projects in addition to wind generation, including hydro-electricity generation. It also states that where a proposal is acceptable in land use terms, and consent is being granted, local authorities may wish to engage in negotiations to secure community benefit in line with the Scottish Government Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments.

Consideration of representations

14. In essence, adjustments were sought to the proposed plan which would: provide more detail of the approach to be taken to renewable energy, including a spatial framework for onshore wind farms which accords with the 2010 Scottish Planning Policy; and ensure that the areas of search comply with the requirements of national guidance and do not take account of landscape capacity sensitivity groupings and buffer zones around individual dwellings, and that they are more realistic.

15. More detailed adjustments were sought which would: provide a reference in Policy E1 to renewable energy developments being of an appropriate scale; restrict further wind farm development because of its detrimental effects on amenity and the environment, and the small economic benefits; delete the reference in Policy E1 to energy from waste, and ensure that the definition of renewable energy in the glossary (Appendix 2) does not allow for the inclusion of nuclear energy; delete the reference in Policy E1 (paragraph 7.2.2) to the proposals map showing areas of potential constraint; ensure consistency between Policy E1 and the proposals map when referring to search areas, and replace the term renewable energy (paragraph 7.2.2) with wind energy; provide more detail on renewable energy developments other than onshore wind; refer explicitly in Policy E1 to Scottish Natural Heritage's guidance on landscape impacts of wind farms/ turbines, introduce search areas for small scale/micro proposals, improve the neighbour notification system, increase the set back distance for individual properties to 2 kilometre, and require all turbines to have a non-reflective finish; and ensure that the landscape impacts referred to in the SEA for Policy E1 are marked as negative.

16. My further information request as a result of the publication of Scottish Planning Policy (2014) has resulted in further adjustments being sought to the proposed plan. In essence, these seek to ensure that consistency is achieved between the 2 documents, including the planning authority's spatial framework and the approach outlined in table 1. Moreover, concern is expressed about additional constraints, such as local biodiversity sites, that have been taken into account in preparing the framework.

17. Concern has also been expressed about some of the criteria set out in the proposed supplementary guidance, most notably, the reference to developer contributions and the separation distance (1 kilometre aimed at controlling noise). Where these are related directly to the content of the proposed plan, I have considered their terms. Otherwise, I

have not dealt with them as the content of supplementary guidance is not scrutinised at an examination. For example, community benefits/contributions arising from renewable energy proposals are not referred to in the proposed plan, but only mentioned in the proposed supplementary guidance. I have therefore not considered representations received on this matter.

18. Scottish Planning Policy (2014) clearly sets out a new approach for preparing a spatial framework from that set out in the 2010 Scottish Planning Policy and the draft 2013 Scottish Planning Policy. A spatial framework prepared under the Scottish Planning Policy (2014) does not have to include the range of matters required in a framework prepared under the earlier national guidance. A spatial framework is now to be focussed on international and national designations, other nationally important mapped environmental interests and community separation. The process of preparing a spatial framework appears less complex. Several of the matters that had previously to be considered for inclusion are now to be dealt with at the development management stage rather than through a spatial framework. Most notably, these include cumulative impact, the green belt, aviation and defence interests, scheduled monuments, and tourism and recreational interests. In a spatial framework for East Renfrewshire, there would be no group (1) areas ie areas where wind farms would not be acceptable. There would be group (2) areas, ie areas where significant protection would be required and, beyond groups (1) and (2), the remaining area would all be group (3), ie an area with potential for wind farm development. Group (2) areas in East Renfrewshire would include at least 2 sites of special scientific interest (Brother Loch and Little Loch), and 2 sites in the inventory of gardens and designed landscapes (Greenbank House, Clarkston, and Rouken Glen Park, Giffnock).

19. The proposed plan and the proposed supplementary guidance should be changed to accommodate Scottish Planning Policy (2014), and this is acknowledged by the planning authority. The spatial framework in the proposed plan identifies only small and fragmented areas of search for wind farms over 20MW. The 2012 study suggests that the assessed area has the potential to accommodate some wind farms (eg in the plateau moorlands regional landscape character type, which has been subdivided into 6 local landscape character types for the purposes of the study). Large parts of the assessed area appear not to have been included in the areas of search in the proposed plan because of the constraints applied, including the assessment of landscape capacity and cumulative impact, buffer zones around individual houses, and local biodiversity sites. This approach has contributed to broad areas of search significantly smaller in size from those shown in the strategic development plan, which does not appear to take into account such constraints. I have concerns about the small size of the search areas because of the challenging national renewable energy targets in place, albeit development would not be precluded without them because the constraints are all being treated as potential ones. I also have doubts about whether the smaller search areas would be able to accommodate a 20MW wind farm.

20. The adjustments required to the spatial framework are greater under Scottish Planning Policy (2014) than they would have been under the 2010 and draft 2013 versions. Under the earlier national guidance, the constraints relating to buffer zones around individual houses and landscape capacity (based on the assessment of the landscape sensitivity of local landscape character types) would have had to be removed. Under Scottish Planning Policy (2014) (table 1), additional constraints relating to cumulative impact, regional and local natural heritage designations and the green belt require to be removed. All these matters, including landscape and visual impacts, and

impacts on individual dwellings will now be fully assessed at the development management stage. Development management is now expected to become a more detailed and exacting process. I believe that the changes made in Scottish Planning Policy (2014) to the preparation of a spatial framework for onshore wind farms is highly likely to result in much larger and more appropriate areas with potential for wind farms under group (3) of the new approach, than the areas currently identified in the proposed plan. In light of the above, I do not consider that there is any sound justification for retaining in the spatial framework the buffer zones around individual properties, or for increasing their size to 2 kilometres.

21. In addition to a new spatial framework being required for onshore wind farms, changes are necessary to the wording of Policy E1. The planning authority proposes some detailed changes to the policy. These include showing the areas of potential constraint only in the supplementary guidance (and not on the proposals map), indicating that the criteria to be used in assessing proposals will be applied to all wind energy applications, and a small amount of additional information in paragraph 7.2.3. However, more extensive changes are required to properly address the representations and Scottish Planning Policy (2014).

22. In particular, Policy E1 and its supporting text should provide an appropriate context for preparing a new spatial framework and applying the provisions of the new national guidance. This is important given that the spatial framework proposed by the planning authority is inconsistent with both the 2014 and the 2010 versions of Scottish Planning Policy. To fully align the revised policy with Scottish Planning Policy (2014), its support for a diverse range of renewable energy technologies could be made clearer by deleting the word “generally” from paragraph 7.2.1. Changes are also required to paragraphs 7.1.2-7.1.4 of the supporting text to ensure that they adequately reflect the terms of the new national guidance. I consider that it would be appropriate for the spatial framework for onshore wind farms to form a part of the supplementary guidance because, under section 24 of the 1997 Town and Country Planning (Scotland) Act (as amended), the development plan, in which Scottish Planning Policy (2014) requires the framework to be set out, includes such guidance.

23. It would be appropriate for the areas with potential for wind farms to be shown on the proposals map, but I am concerned about committing to this in Policy E1 because any delay in identifying them could potentially affect the progress of the proposed plan. If these areas are not included, Schedule 18 (renewable energy) can be taken out of the proposed plan. Scottish Planning Policy (2014) indicates that proposals for energy infrastructure developments should always take account of spatial frameworks for wind farms and heat maps, and lists a number of considerations (paragraph 169) which can be used in assessing proposals. These considerations are the most up to date available at this time, and they form a reasonable basis for assessing proposals and should be referred to in the policy. These considerations apply to energy infrastructure developments in general, and this should be reflected in the policy, and the planning authority’s proposal to refer to a range of criteria only for wind energy developments should be deleted. The supplementary guidance can reasonably contain the full details of the considerations to be used in assessing proposals, based on the list of considerations set out at paragraph 169. Paragraph 7.2.3 can be deleted from the policy because the preparation of supplementary guidance can adequately be dealt with in paragraph 7.2.2.

24. Other adjustments were requested to the proposed plan, including to policy E1. I agree that there is some ambiguity in the definition of renewable energy provided in the

glossary of the proposed plan (Appendix 2). I have therefore recommended that it be adjusted to make clear that it only refers to the generation of energy using renewable sources. This appropriately reflects the thrust of the 2010 and the 2014 Scottish Planning Policies.

25. I consider that the remaining adjustments proposed in representations would be inappropriate. It is unnecessary to provide more detail on non-wind forms of renewable energy in the proposed plan. Policy E1 and its supporting text both deal with renewable energy as a whole, and refer to a number of different technologies (including biomass and hydro-electric). As outlined above, policy considerations for all renewable energy developments should be developed by the planning authority, based on those in Scottish Planning Policy (2014). However, it is reasonable for the proposed plan to focus mainly on wind energy because this is likely to remain the largest source of renewable energy for the time being. I believe that it would be inappropriate to set out a more restrictive policy for renewable energy, including further restrictions on wind farms, because this would be contrary to Scottish Planning Policy (2014). There is no need or requirement for the planning authority to insert in Policy E1, an explicit reference to renewable energy developments being of an appropriate scale. This would be part of the assessment of a proposal at the development management stage. References to the areas of potential constraints for wind energy (Policy E1 only) and broad areas of search (Policy E1 and the key of the proposals map [E1.1]) are no longer necessary because of the changes required to the proposed plan.

26. I believe that it is reasonable to retain the reference to energy from waste in Policy E1. The 2014 Thermal Treatment of Waste Guidelines indicates that energy generated from the recently grown materials in waste, eg food residues, is considered renewable, and Scottish Planning Policy (2014) identifies energy recovery as an option when dealing with waste, albeit lower down the waste hierarchy than prevention, reuse and recycling. Energy recovery must be done in the most efficient manner possible, and can be eligible for support under the Renewables Obligation Scheme.

27. I consider that it is unnecessary to explicitly refer in Policy E1 to Scottish Natural Heritage's suite of guidance on landscape impacts of wind farms/turbines. Where appropriate, the terms of such guidance, and any other relevant guidance, would be taken into account as material considerations at the development management stage. I believe that it would be inappropriate for the proposed plan to seek a variation in the neighbour notification system because the procedures to be followed for all development proposals, including wind energy, are set out in legislation. I can see no evidence before the examination which would justify changes to the proposed plan requiring search areas to be established for small scale/micro developments and a non-reflective finish for all wind turbines. Such search areas are not required by national guidance, and finishes of turbines are detailed matters which can reasonably be assessed during the processing of an application.

28. The planning authority agrees that the Strategic Environmental Assessment should be adjusted so that the landscape impacts for Policy E1 are marked as negative. However, this matter cannot be further considered in the report because the Strategic Environmental Assessment is not being scrutinised through this examination.

29. Overall, significant adjustments are required to Policy E1 in the proposed plan and its supporting text, all as set out below. The planning authority should also make any necessary consequential adjustments.

Reporter's recommendations:

I recommend that the following modifications be made:

1) Adjust Policy E1 (to include the deletion of paragraph 7.2.3) to read (*changes in italics*):

“7.2 Policy E1: Renewable Energy

7.2.1 The council will support renewable energy *infrastructure developments*, including micro-renewable energy technologies on individual properties, wind turbine developments, hydro electric, biomass and energy from waste technologies in appropriate locations. *The assessment of applications for such developments will be based on the principles set out in Scottish Planning Policy (2014), in particular, the considerations set out at paragraph 169 and additionally, for onshore wind developments, the terms of Table 1: Spatial Frameworks.* Where appropriate, the applicant will be required to submit satisfactory mitigation measures to alleviate any adverse environmental impacts.

7.2.2 *The council will prepare statutory supplementary guidance which accords with the Scottish Planning Policy (2014), and which contains the full spatial framework for onshore wind energy, sets policy considerations against which all proposals for renewable energy infrastructure developments will be assessed, and provides further detailed information and guidance on renewable energy technologies”;*

2) Adjust paragraph 7.1.2 to read (*changes in italics*):

“7.1.2 The Scottish Government has set targets to meet the equivalent of *100% of electricity demand from renewables by 2020....*”;

3) Adjust paragraph 7.1.3 to read (*changes in italics*):

“7.1.3 Whilst wind energy is likely to make the most substantial contribution to renewable energy targets, Scottish Planning Policy (2014) advises that the *planning system* should support the development of a diverse range of *electricity generation from renewable energy technologies at appropriate locations.* *It also advises that development plans should seek to ensure an area's full potential for electricity and heat from renewable sources is achieved in line with national climate change targets, giving due regard to relevant environmental, community, and cumulative impact considerations”;*

4) Insert a new paragraph after paragraph 7.1.3:

“7.1.4 The 2010 Scottish Planning Policy guidelines for a spatial framework for onshore wind farms have been superseded by the terms of Scottish Planning Policy (2014). The council's proposed supplementary guidance on renewable energy, including its proposed spatial framework, was published in December 2012 and consulted on between February and May 2013, and does not comply with the new guidelines. Scottish Planning Policy (2014) sets out a new approach to the spatial framework based on 3 groups – (1) areas where wind farms will not be acceptable, (2) areas of significant protection where wind farms may be appropriate in some circumstances, and (3) areas beyond groups (1) and (2) where wind farms are likely to be acceptable, subject to detailed consideration against identified policy criteria. The spatial framework will include national and international

designations (eg sites of special scientific interest and sites in the inventory of gardens and designed landscapes), nationally important mapped environmental interests (eg carbon rich soils), and community separation distances as group (2) areas. The Scottish Planning Policy (2014) indicates that the spatial framework is to be complemented by a more detailed and exacting development management process where the merits of an individual proposal will be carefully considered against the full range of environmental, community, and cumulative impacts”;

5) Adjust paragraph 7.1.4 to read (*changes in italics*):

“7.1.5 Policy E1 Renewable Energy sets out the overall approach to the assessment of proposed renewable energy infrastructure developments. It also deals with the preparation of statutory supplementary guidance, which will provide further detailed information and guidance on renewable energy, including wind energy, biomass, combined heat and power, ground source heating, and devices which can be mounted on existing buildings. The supplementary guidance will contain the spatial framework for wind energy and the policy considerations for assessing all proposed developments, as well as offering advice on methods of energy reduction in relation to both new and existing development”;

6) Delete Schedule 18;

7) Delete the Policy E1.1 areas of broad search from the proposals map and its key;

8) Adjust the definition of renewable energy in the glossary of terms (Appendix 2) to read:

“Renewable energy: The generation of energy using renewable sources, most commonly including technologies such as wind power, hydro-electric and biomass schemes.”

Issue 15	ENERGY EFFICIENCY	
Development plan reference:	Policy E2: Energy Efficiency	Reporter: Dilwyn Thomas
Body or person(s) submitting a representation raising the issue (including reference number):		
RSPB Scotland, South and West Region (Ref 280/11) Persimmon Homes (743/11) Homes for Scotland (758/6)		
Provision of the development plan to which the issue relates:	Chapter 7: Managing the Wider Environment Para. 7.1 – 7.3.3	
Planning authority's summary of the representation(s):		
<p><u>Policy E2: Energy Efficiency</u></p> <p><u>Support</u></p> <p><u>RSPB Scotland, South and West Region (Ref 280/11)</u> - Support policy</p> <p><u>Objection</u></p> <p><u>Persimmon Homes Ltd (Ref 743/11)</u> Setting artificial requirements for the use of micro-renewable technologies is discredited and unnecessary. It is suggested that the development plan is not the right place for policies which relate to Buildings Standards matters. Energy efficiency and carbon reduction can be dealt with entirely through Building Standards. The development plan should rightly concern itself with matters relating to site planning.</p> <p><u>Homes for Scotland (Ref 758/6)</u> This policy is clearly outdated, being based on historic Building Standards and on the provisions of SPP6 and PAN 68, both now repealed. SPP no longer refers to a requirement to use low and zero-carbon generating technology; it is suggested as one option but is not required. In reality, developers are already achieving very low carbon emissions and high energy-efficiency in new buildings, and where they are building to the 2010 Building Regulations then there is no requirement to go further in terms of efficiency.</p>		
Modifications sought by those submitting representations:		
<p><u>Persimmon Homes Ltd (Ref 743/11), Homes for Scotland (Ref 758/6)</u></p> <p>Deletion of policy.</p>		

Summary of responses (including reasons) by planning authority:**Policy E2: Energy Efficiency****Support****RSPB Scotland, South and West Region (Ref 280/11)**

The Council acknowledges and welcomes the support for Policy E2.

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

Objections**Persimmon Homes (743/11), Homes for Scotland (758/6)**

The Climate Change (Scotland) Act 2009 specifically mentions the role of LDPs in ensuring buildings are designed in an environmentally sensitive way. The Policy remains appropriate and will be retained in the Plan. The Supplementary Planning Guidance on Energy Efficient Design (CD/31) will be checked and updated to ensure it accords with current national policy and guidelines.

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

Reporter's conclusions:

1. Policy E2 in the proposed plan states:

“7.3 Policy 2: Energy Efficiency

7.3.1 All new buildings must be designed so that at least 10% of the carbon dioxide emissions reductions standard, set by Scottish Building Standards, is met by the installation and operation of low and zero-carbon generating technologies. This percentage will increase to 15% by the beginning of 2015.

7.3.2 Other solutions will be considered where:

- an applicant is able to demonstrate that there are significant technical constraints in using on site low and zero carbon generating technologies;
- where there is likely to be an adverse impact on the historic environment; or
- where development of the following types is proposed: extensions to existing buildings, buildings which have an intended life of less than 2 years, standalone ancillary buildings with an area of less than 50 square metres, or buildings which will not be heated or cooled other than for the purposes of frost protection.

7.3.3 Further detailed information and guidance is provided in the Energy Efficient Design Supplementary Planning Guidance.”

2. Adjustments are sought to the proposed plan which would delete the policy. Further adjustments are sought which would use the policy to direct new housing and businesses to lower altitude sites in preference to higher ones. The planning authority proposes no change to the plan.

3. Section 3E of the 1997 Town and Country Planning (Scotland) Act (as amended) requires, amongst other things, that the preparation of development plans is exercised “with the objective of contributing to sustainable development.” Section 72 of the 2009 Climate Change (Scotland) Act inserted a new section 3F into the 1997 Act, which requires local development plans to include policies designed “to ensure that all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions from their use... through the installation and operation of low and zero carbon generating technologies.”

4. The 2010 Scottish Planning Policy referred to section 72 of the 2009 Act, and indicated that the planning system has an important role in supporting the achievement of sustainable development through its influence on the location, layout and design of new development. Scottish Planning Policy (2014) has introduced a presumption in favour of development that contributes to sustainable development, and it has set an outcome of achieving a low carbon place through reducing carbon emissions and adapting to climate change. It indicates that by seizing opportunities to encourage mitigation and adaptation measures, planning can support the transformational change required to meet emission reduction targets and influence climate change. It also indicates that planning can influence people’s choices to reduce the environmental impacts of consumption and production.

5. Policy E2 broadly supports the strategic aim, objectives and themes underpinning the proposed plan, and it is consistent with the thrust of the strategic approach taken to climate change in the Glasgow and Clyde Valley Strategic Development Plan. The proposed plan sets out one way of addressing section 72 of the 2009 Act (and section 3F of the 1997 Act), and there may be other possibilities. While the terms of section 72 (and section 3F) may not be referred to explicitly in Scottish Planning Policy (2014), they remain relevant and are highlighted in Planning Circular 6/2013, Development Plans. At face value, Policy E2 appears a reasonable approach to meeting the terms of section 72 (and section 3F), and achieving energy efficiency through the installation and operation of low and zero carbon generating technologies is clearly a matter that has to be addressed in the proposed plan. It cannot be dealt with solely through Scottish Building Standards. The policy therefore requires to be retained.

6. Reference is made in one representation to the Sullivan Commission reconsidering the timing and pace of change for improving energy efficiency measures and, in tandem with this, it is also apparent that Scottish Buildings Standards are evolving. Policy E2 provides one increase in the percentage of emissions to be saved by low and zero carbon generating technologies. However, this is to be implemented early in the life of the plan, and further changes may be necessary. To allow some flexibility, I consider that the policy should include opportunities to review the percentage figure again during the lifetime of the plan.

7. I believe that it is unnecessary to include in Policy E2 provisions which would direct new housing and business development to lower altitudes because this would be overly restrictive, and could also inappropriately affect the proposed plan’s strategy.

8. An adjustment is required to the proposed plan as set out below.

Reporter's recommendations:

I recommend that the following modification be made:

1) Add the following to paragraph 7.3.1 (*changes in italics*):

"7.3.1 All new buildings must be designed so that at least 10% of the carbon dioxide emissions reductions standard, set by Scottish Building Standards, is met by the installation and operation of low and zero carbon generating technologies. This percentage will increase to 15% by the beginning of 2015, and may be changed again during the lifetime of this plan following any reviews of Scottish Building Standards..."

Issue 16.1	WATER ENVIRONMENT AND FLOODING	
Development plan reference:	Policy E3: Water Environment Policy E4: Flooding Policy E5: Surface Water Drainage and Water Quality Policy E6: Waste Water Treatment	Reporter: Michael Cunliffe
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>SEPA (Ref 70/5) Scottish Water (Ref 256/7) (Ref 256/8) RSPB Scotland, South and West Region (Ref 280/12) (Ref 280/13) Norman Graham (Ref 286/6) (Ref 286/7) (Ref 286/15) Lynda Murray (Ref 511/5) (Ref 511/7) Neil Warren (Ref 578/4) (Ref 578/9) James Sandeman (Ref 600/13) Newton Mearns Community Council (Ref 686/6) (Ref 686/7) (Ref 686/14) Nazir Ahmed (Ref 755/34) (Ref 755/35) (Ref 755/36) (Ref 755/37) D Jesner (Ref 783/7) Iain McCowan (Ref 896/7) (Ref 896/9) (Ref 896/13)</p> <p><u>Appendix 1 – Standard Letters</u> Standard Letter Comment E3A (17 reps) (Ref 989/1) Standard Letter Comment E4A (17 reps) (Ref 990/1) Standard Letter Comment E6A (18 reps) (Ref 991/1)</p>		
Provision of the development plan to which the issue relates:	Chapter 7: Managing the Wider Environment Para 7.4-7.9.2	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy E3: Water Environment</u></p> <p><u>Support</u></p> <p><u>RSPB Scotland, South and West Region (Ref 280/12)</u> - Support policy</p> <p><u>Nazir Ahmed (Ref 755/34)</u> - Support policy</p> <p><u>Objection</u></p> <p><u>Standard Letter Comment E3A (17 reps) (Ref 989/1)</u> In some areas current residents experience episodes of failure of water supply. The various assessments in the proposed LDP talk of mitigation without expanding how this will be achieved. New developments have to introduce pumps to guarantee supply to the new development but to the detriment of current residents. No development should proceed until Scottish Water can guarantee water supply to current residents.</p>		

(b) Policy E4: Flooding**Support**

RSPB Scotland, South and West Region (Ref 280/13) - Support policy

Norman Graham (Ref 286/6) - Support presumption against development at risk from flooding and flood plains.

Lynda Murray (Ref 511/5)

Support the presumption against development on functional flood plains
 Support Council to resist development in flood risk areas
 Support infrastructure developments may be permitted on watercourses but only where development is required for operational or could not be located elsewhere

Neil Warren (Ref 578/4)

Support the presumption against development on functional flood plains
 Support Council to resist development in flood risk areas
 Support infrastructure developments may be permitted on watercourses but only where development is required for operational or could not be located elsewhere
 SUDs in should be in all new developments
 General presumption against culverting of watercourses

Newton Mearns Community Council (Ref 686/6)

Support presumption against development within flood plains
 Support resisting development within areas at risk of flooding in accordance with SPP.
 Support that infrastructure developments may be permitted on water courses as exceptions to policy.

Nazir Ahmed (Ref 755/35) - Support policy

D Jesner (Ref 783/7)

Development at risk of flooding or that could increase flood risk elsewhere should be resisted
 Presumption against development in functional flood plains
 Council to resist development on accordance with SPP risk framework
 Development of infrastructure on watercourses

Iain McCowan (Ref 896/7) (Ref 896/13)

(Ref 896/7) Support presumption against development in flood plains
 Support resistance of development in areas at risk of flooding
(Ref 896/13) Support infrastructure on watercourses as exceptions

Objections**SEPA (Ref 70/5)**

Support inclusion of a policy but E4 is too brief and overlooks several aspects of sustainable flood risk management. Link to SPG may address points below.
 We welcome the inclusion of a 'presumption against development' within the functional flood plain, and the clear reference that is made to the Risk Framework. It would be useful to emphasise that this policy should be looked at in conjunction with the flooding requirements of SPP as a whole (paragraphs 196 to 208) and that the functional flood

plain equates to the 'medium to high risk' category

We require an explicit reference to be made to avoidance being the first principle of flood risk management – as per the requirements of SEPA's Interim Position on Flooding and Planning.

As per LUPS-GU11 we also require the development plan to identify and protect existing land uses that contribute/have potential to contribute towards sustainable flood management.

Policy makes reference to water attenuation areas; however it is not thought that these areas have been formally identified.

Encourage East Renfrewshire Council to expand on what a Flood Risk Assessment is, and when such an assessment would be required - reference climate change (with reference to its impacts on flood risk) and what East Renfrewshire's policy is on freeboard.

In section 4 the wording of this section should be altered to be consistent with the wording of SPP

Within SPP there is not a blanket exception for infrastructure development within the medium to high risk zone, and we will object to any infrastructure development that falls outwith the categories of exceptions as per the Risk Framework.

Whilst we welcome the inclusion of clear support for development that would reduce the likely incidents of flooding it would be useful to expand this to include flood risk vulnerability. In many instances the most effective means of reducing flood risk is through redevelopment that reduces the vulnerability of existing sites and buildings located within the functional flood plain.

It would be useful to reference the Flood Risk Management (Scotland) Act 2009. This is legislation which dictates i) our responsibilities and those of East Renfrewshire Council as the local Flood Prevention Authority with regards to reducing flood risk overall, and requires ii) that all potential sources of flood risk must be considered.

Scottish Water (Ref 256/7) - Suggest word change.

James Sandeman (Ref 600/13) - Council not taking flood responsibilities seriously with approval of SG1.27 and proposed M2.1

Standard Letter Comment E4A (17 reps) (Ref 990/1) - Newton Mearns exposed to flood risk due to housing proposals. Very little mitigation for downstream residents if upstream developments are approved.

(c) Policy E5: Surface Water Drainage and Water Quality

Support

Norman Graham (Ref 286/7) - Support development of SUDS

Lynda Murray (Ref 511/7)

Support SUDs in all new developments

Must be general presumption against diverting watercourses

Newton Mearns Community Council (Ref 686/14) - Support SUDs in all new development

Nazir Ahmed (Ref 755/36) - Support policy

Objections

Norman Graham (Ref 286/15) - Object to new developments with SUDs draining through private watercourses and culverts

Neil Warren (Ref 578/9), Newton Mearns Community Council (Ref 686/7), Iain McCowan (Ref 896/9)

Support SUDs in all new developments

Must be a presumption against culverts in new development

(d) Policy E6: Waste Water Treatment**Support****Scottish Water (Ref 256/8)**

Scottish Water is funded to provide upgrades at treatment works where 5 growth criteria have been met - lack of capacity should not be seen as a barrier to development .

Early conversations with developers advised to ensure maximum time for scheduling of upgrades.

Nazir Ahmed (Ref 755/37) - Support policy

Objection

Standard Letter Comment E6A (18 reps) (Ref 991/1) - Capacity of sewerage system insufficient resulting in frequent overflow in Newton Mearns, new developments will add to this. Mitigation proposed in LDP is not feasible.

Modifications sought by those submitting representations:**(a) Policy E3: Water Environment**

Standard Letter Comment E3A (17 reps) (Ref 989/1) - No development should proceed until Scottish Water can guarantee water supply to current residents.

(b) Policy E4: Flooding**SEPA (Ref 70/5)**

1. It would be useful to emphasise that this policy should be looked at in conjunction with the flooding requirements of SPP as a whole (paragraphs 196 to 208) and that the functional flood plain equates to the 'medium to high risk' category
2. We require an explicit reference to be made to avoidance being the first principle of flood risk management – as per the requirements of SEPA's Interim Position on Flooding and Planning.
3. As per LUPS-GU11 we also require the development plan to identify and protect existing land uses that contribute/ have potential to contribute towards sustainable flood management.
4. Water attenuation areas should be formally identified.
5. Policy should reference climate change (with reference to its impacts on flood risk) and what East Renfrewshire's policy is on freeboard.
6. In section 4 the wording of this section should be altered to be consistent with the wording of SPP

7. Within SPP there is not a blanket exception for infrastructure development within the medium to high risk zone.
8. Expand to include flood risk vulnerability.
9. It would be useful to reference the Flood Risk Management (Scotland) Act 2009.

Scottish Water (Ref 256/7) - Para. 7.4.4. replace word "constraints" with "issues".

James Sandeman (Ref 600/13) - Delete Proposal M2.1.

Standard Letter Comment E4A (17 reps) (Ref 990/1)

Sites should not be developed if they pose significant flood risk to current residents. Mitigation is not an option. SEPA and Scottish Water should advise.

(c) Policy E5: Surface Water Drainage and Water Quality

Norman Graham (Ref 286/15)

Norman Graham (Ref 286/7)

SUDs should be adopted by Scottish Water Plans, Flood Risk and Drainage Assessments completed and stored for all developments and reported to Planning Committee.

Neil Warren (Ref 578/9) Newton Mearns Community Council (Ref 686/7), Iain McCowan (Ref 896/9)

Policy E5, must include the following additional points:

1. Any new developments requiring SUDS, should not be reliant on discharge through private culverts via private gardens. If any such developments are to be considered, then agreement would first need to be obtained from all riparian land owners for a wayleave, and an enforceable maintenance regime.
2. All SUDS detention basins and ponds will be adopted by Scottish Water, so that all downstream riparian land owners have the full insurance protection of Scottish Water.
3. All Compensatory Flood Stores will be built to the same minimum best practice standards as Scottish Water SUDS detention basins, outflow limited to a 2-year return period, and be adopted by East Renfrewshire Council, so that all downstream riparian land owners have the full statutory insurance protection of East Renfrewshire Council.
4. Flood Risk and Drainage Impact assessments for developments requiring SUDS must include full hydrological modelling of the downstream watercourse including culverts.
5. East Renfrewshire Council will maintain a copy of the micro-drainage calculations for all new developments requiring SUDS; including any fluvial flows and Compensatory Flood Stores. These calculations will be available for public consultation.
6. East Renfrewshire Council Flood Prevention Officer will check, or have independently checked any micro-drainage calculations for all new developments requiring SUDS; including any fluvial flows and Compensatory Flood Stores, prior to Planning Application Committees, and not rely on developers self-certifying their own designs. The Flood Prevention Officer will be required to provide a report to the Planning Applications Committee and their independent analysis must be available for public consultation.

(d) Policy E6: Waste Water Treatment

Standard Letter Comment E6A (18 reps) (Ref 991/1) - Housing development should not proceed until Scottish Water have augmented sewer capacity in affected areas.

Summary of responses (including reasons) by planning authority:**(a) Policy E3: Water Environment****Support****RSPB Scotland, South and West Region (Ref 280/12), Nazir Ahmed (Ref 755/34)**

The Council acknowledges and welcomes the support for Policy E3.

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

Objections**Standard Letter Comment E3A (17 reps) (Ref 989/1)**

Failure of water supply is not a matter for the LDP and is the responsibility of Scottish Water. The Proposed Plan outlines the role the Council plays at a local level – it is responsible for the protection and improvement of the water environment and can support water management and flood risk management through appropriate land use policies. The Council has worked in close partnership with Scottish Water and SEPA in the preparation of the Plan.

In terms of mitigation Sections 7.4 – 7.7 and the following Policies of the Plan adequately address the water environment requirements of all development proposals:

- E3: Water Environment,
- E4: Flooding, and
- E5: Surface Water Drainage and Water Quality

The detail can be safely managed by the development management process.

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

(b) Policy E4: Flooding**Support****RSPB Scotland, South and West Region (Ref 280/13), Norman Graham (Ref 286/6), Lynda Murray (Ref 511/5), Neil Warren (Ref 578/4), Newton Mearns Community Council (Ref 686/6), Nazir Ahmed (Ref 755/35), D Jesner (Ref 783/7), Iain McCowan (Ref 896/7, 896/13)**

The Council acknowledges and welcomes the support for Policy E4.

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

Objections**SEPA (Ref 70/5)**

1. Note general support for inclusion of Policy, note comment regarding brevity and will provide further comments on individual matters raised. Some points are accepted as valid and the policy enhanced in line with the comments. The Council has no plans to prepare SPG on flooding at this time as it is believed that the current policy framework (with proposed additions) together with the development management process will provide sufficient protection.

2. This point is accepted.

If the Reporter is so minded the suggested additional text set out below by SEPA should be added to Para. 7.4.6 and bullet point 3 of Policy E4. The Council would be supportive of this modification because it would not have any implications for the Strategy or other policies within the LDP.

Para. 7.4.6 should read (additional text in italics):

Scottish Planning Policy distinguishes between areas of low to medium flood risk and medium to high risk with recommendations on development restrictions for both categories. The recommendations vary between built-up areas and undeveloped and sparsely developed areas. The Local Development Plan will adhere to the risk framework set out in the Scottish Planning Policy (2010) when considering development proposals affected by flooding issues.

Policy E4 bullet point 3 should read (additional text in italics):

.....functional flood plains. The functional flood plain equates to the 'medium to high risk' category. Water attenuation areas.....

3. Accepted.

If the Reporter is so minded the suggested additional text set out below by SEPA should be added to Policy E4. The Council would be supportive of this modification because it would not have any implications for the Strategy or other policies within the LDP and would strengthen Policy E4..

Policy E4 Insert new bullet point 5 to read (additional text in italics):

5. At all times, avoidance will be the first principle of flood risk management as per the requirements of SEPA's Interim position on Flooding and Planning.

4 and 5. The existing Adopted local Plan identified in Proposal E11 three locations that supported the White Cart Flood Prevention scheme. These schemes have now been completed and are operational. The Council do not consider that any further action is required in this respect.

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

6. Accepted in part.

If the Reporter is so minded the suggested additional text set out below by SEPA should be added to bullet point 1 of Policy E4. The Council would be supportive of this modification because it would not have any implications for the Strategy or other policies within the LDP.

Bullet point 1 will be strengthened by the addition of a new sentence to read (additional text in italics) :

A flood risk assessment will be required for any development within the SEPA functional flood plain.

7. The Council considers that the wording of this policy together with the references to SPP adequately covers this point.

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

8. Accepted.

If the Reporter is so minded the suggested additional text set out below by SEPA should be added to bullet point 2 of Policy E4. The Council would be supportive of this modification because it would not have any implications for the Strategy or other policies within the LDP.

Bullet point 2 will be strengthened by the addition of a new sentence to read (additional text in italics):

Development that will reduce the likely incidences of flooding or vulnerability to flooding will be supported.....

9. The Council does reference the Flood Risk Management Act in para 7.4.4 and no further reference is considered necessary.

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

Scottish Water (Ref 256/7)

This revision is accepted.

If the Reporter is so minded the suggested revision set out below by Scottish Water should be included in Para. 7.4.4. The Council would be supportive of this modification because it would not have any implications for the Strategy or other policies within the LDP.

Para 7.4.4 final sentence should read (additional text in italics):

These may raise potential ~~constraints~~ issues to development and will inform development decisions.

James Sandeman (Ref 600/13)

The Council is statutorily required by the Flood Risk Management (Scotland) Act 2009 to reduce flood risk overall from all sources. It takes this duty seriously. A hydrological study has been undertaken to inform the Development Framework for Malletsheugh/Maidenhill master plan area and assist with identifying developable areas and any mitigation required. Further information is included under Issue 3.3.

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

Standard Letter Comment, E4A (17 reps) (Ref 990/1)

Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals. The detail can be safely managed through the development management process and liaison with Scottish Water and SEPA.

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

(c) Policy E5 – Surface Water Drainage and Water Quality**Support****Norman Graham (Ref 286/7), Lynda Murray (Ref 511/7), Newton Mearns Community Council (Ref 686/14), Nazir Ahmed (Ref 755/36)**

The Council acknowledges and welcomes the support for Policy E5.

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

Objections**Norman Graham (Ref 286/15), Neil Warren (Ref 578/9), Iain McCowan (Ref 896/9), Newton Mearns Community Council, (Ref 686/7)**

The Council believe that points 1, 3, 4 and 6 are very much points of detail that would be considered rigorously through the development management process, in many cases in consultation with Scottish Water and the flood authority (ERC).

Point 2 - Support for SUDs is noted and welcomed. Adoption by Scottish Water is a matter for Scottish Water. Any culverting of water courses is the responsibility of Scottish Water.

Point 5 – Any information received in connection with a planning application, unless of a sensitive nature, are displayed on the Council website, accessible by members of the public.

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

(d) Policy E6: Waste Water Treatment**Support****Scottish Water (Ref 256/8), Nazir Ahmed (Ref 755/37)**

The Council acknowledges and welcomes the support for Policy E6. Support from Scottish Water is appreciated and answers some of the concerns in respect of potential

infrastructure constraints for the major land releases.

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

Objections

Standard Letter Comment E6A (18 reps) (Ref 991/1)

The response from Scottish Water Ref 256/8 indicates that Scottish Water are funded to provide upgrades and lack of capacity should not be seen as a barrier to Development.

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

Reporter's conclusions:

Policy E3: Water Environment

1. Failure of water supply is not a matter for the local development plan and is the responsibility of Scottish Water. This is confirmed by Scottish Water in its representations, which support the proposed plan and commit it to working closely with the council and all interested parties in the master planning and regeneration processes. Scottish Water states that it is funded to provide upgrades at treatment works where growth criteria have been met, so that lack of capacity should not be seen as a barrier to development.

2. I consider that the close working between the council and Scottish Water that has taken place during the plan preparation process, and that will be continued through master planning and development management, provides a sufficient safeguard that water supply can be provided for new development without compromising the interests of existing customers. There is therefore no need to change the proposed plan in response to representations.

Policy E4: Flooding

3. Representations by the Scottish Environment Protection Agency request a number of detailed changes to this part of the proposed plan. Since the plan was prepared and these representations were submitted, a new version of Scottish Planning Policy has been published. Paragraphs 254 to 268 deal with Managing Flood Risk and Drainage. It is important to ensure that the proposed plan is consistent with this advice.

4. I agree that it would be useful to emphasise that this policy should be looked at in conjunction with the flooding requirements of Scottish Planning Policy as a whole and that the functional flood plain equates to the 'medium to high risk' category. The council also accepts this, and proposes amendments to the wording of paragraph 7.4.6 and to section 3 of Policy E4. I am content to recommend the council's proposed modifications.

5. I agree that explicit reference should be made to avoidance being the first principle of flood risk management. The council also accepts this and proposes adding a fifth subsection to Policy E4. However, I consider it would be better to modify section 1 of Policy E4 by inserting at the beginning: "At all times, avoidance will be the first principle of flood risk management." I do not consider it necessary to refer to the Scottish Environment Protection Agency's Interim Position on Flooding and Planning, which is liable to be superseded during the lifetime of the plan.

6. With regard to the local development plan identifying and protecting existing land uses that contribute/have potential to contribute towards sustainable flood management, and the suggestion that water attenuation areas should be formally identified, the council does not consider that any further action is required in this respect. I take the council's point that the adopted local plan identified in Proposal E11 three locations that supported the White Cart Flood Prevention Scheme, which is now complete and operational, but consider that there are likely to be areas within East Renfrewshire, other than those contributing directly to the White Cart scheme, that have a role in sustainable flood management: for example, the natural flood plains associated with various watercourses, where development should be avoided to allow them to continue to function. However, these have been taken into account in preparing the plan, and will further be taken into account through the operation of Policy E4 (particularly section 3) in the development management process and through consultation with the Scottish Environment Protection Agency on planning applications. I do not consider it necessary to list these areas or to identify them explicitly on the Proposals Map.

7. The council accepts that the policy should refer to climate change (with reference to its impacts on flood risk), and proposes adding a sentence to section 1 of Policy E4: "A flood risk assessment will be required for any development within the Scottish Environment Protection Agency functional flood plain." Such an assessment would address matters of climate change and freeboard, although I think that the Scottish Environment Protection Agency was looking for more explicit reference to these matters in the proposed plan itself. This could be met by expanding the council's proposed additional wording to include, "taking account of climate change". I do not think a reference to freeboard in the plan is required. In the absence of a statement to the contrary, I would assume that the Scottish Environment Protection Agency's recommended minimum freeboard of 500-600 millimetres would apply. This could always be increased in particular cases, where the consequences of the freeboard being exceeded would be severe.

8. I agree with the Scottish Environment Protection Agency that section 4 of Policy E4 does not accurately reflect Scottish Planning Policy as there is not a blanket exception for infrastructure development within the medium to high risk zone. The council considers that the wording of this policy together with the references to Scottish Planning Policy adequately covers this point. However, the application of the risk framework to infrastructure in Scottish Planning Policy (paragraph 263) is quite complex, distinguishing between 'essential infrastructure' and 'civil infrastructure', between watercourse flood risk and surface water flooding, and between built-up and undeveloped areas. Rather than import the detail of Scottish Planning Policy into the proposed plan, I consider that section 4 should be simplified to read, "Infrastructure developments may be permitted in areas of flood risk in the circumstances, and subject to the requirements, set out in the flood risk framework in Scottish Planning Policy."

9. I accept that section 2 of Policy E4 should be expanded to include, "or vulnerability to flooding", since flood risk can also be minimised through redevelopment that reduces the vulnerability of existing sites and buildings located within the flood plain. There is already a reference to the Flood Risk Management (Scotland) Act 2009 in paragraph 7.4.4, and I agree with the council that this is sufficient.

10. Scottish Water (Ref 256/7) suggests that in paragraph 7.4.4, the word "constraints" should be replaced by "issues". The council accepts this, and I am content to endorse the modification since flood risk management plans can have wider implications for development that will not always take the form of constraints .

11. I note that the council has undertaken a hydrological study to inform the development framework for the Malletsheugh/Maidenhill master plan area and assist with identifying developable areas and any mitigation required. Further information is included under Issue 3.3. I do not accept that the council has ignored its flood responsibilities in proposing development at M2.1. As regards SG1.27, I have dealt with this under Issue 9.1.4. I do not consider that there is any need to modify the proposed plan.

12. I acknowledge the concerns expressed that sites should not be developed if they pose significant flood risk to current residents, and that mitigation is not an option for some sites. However, I am satisfied that as argued by the council, Policies E3, E4 and E5 of the proposed plan adequately address the water environment requirements of all development proposals, and that the detail can be managed through the development management process and liaison with Scottish Water and the Scottish Environment Protection Agency. I do not consider that there is any need to modify the proposed plan.

Policy E5: Surface Water Drainage and Water Quality

13. The adoption of Sustainable Drainage Systems (SuDS) is a matter for Scottish Water. While I acknowledge the concerns of Newton Mearns Community Council and others who have made representations on this matter, I agree with the council that it is not necessary to spell out detailed requirements for SuDS in the proposed plan. The combination of Policies E4 and E5 should ensure that development provides effective surface water drainage without increasing flood risk elsewhere. I therefore do not consider that there is any need to modify the proposed plan.

Policy E6: Waste Water Treatment

14. I note Scottish Water's response which indicates that Scottish Water is funded to provide upgrades at treatment works where the growth criteria have been met, so that lack of capacity should not be seen as a barrier to development. Commenting on the Monitoring Statement, Scottish Water states that one of the criteria is that the developer can confirm plans are in place to mitigate any network constraints that will be created by the development. Mechanisms therefore exist to ensure that new development can proceed without adversely affecting existing Scottish Water customers. I do not consider that there is any need to modify the proposed plan in the light of the representations.

Reporter's recommendations:

I recommend that the following modifications be made:

1. Paragraph 7.4.4, final sentence, delete "constraints to" and insert "issues for".
2. Paragraph 7.4.6 should be replaced as follows:

"Scottish Planning Policy distinguishes between areas of low to medium flood risk and medium to high risk with recommendations on development restrictions for both categories. The recommendations vary between built-up areas and undeveloped and sparsely developed areas. The Local Development Plan will adhere to the risk framework set out in Scottish Planning Policy when considering development proposals affected by flooding issues."

3. In Policy E4: Flooding –

3.1 Section 1 should be replaced as follows:

“At all times, avoidance will be the first principle of flood risk management. Development which could be at significant risk from flooding, and/or could increase flood risk elsewhere will be resisted. A flood risk assessment taking account of climate change will be required for any development within the Scottish Environment Protection Agency functional flood plain.”

3.2. In Section 2, after “incidences of flooding”, insert “or vulnerability to flooding”.

3.3. In Section 3, after “functional flood plains” insert a new sentence: “The functional flood plain equates to the ‘medium to high risk’ category.”

3.4 Section 4 should be replaced as follows:

“Infrastructure developments may be permitted in areas of flood risk in the circumstances, and subject to the requirements, set out in the flood risk framework in Scottish Planning Policy.”

Issue 16.2	WASTE	
Development plan reference:	Policy E7: Waste Management	Reporter: Michael Cunliffe
Body or person(s) submitting a representation raising the issue (including reference number):		
SEPA (Ref 70/55) James Whyteside (Ref 82/16) Nazir Ahmed (Ref 755/38)		
Provision of the development plan to which the issue relates:	Chapter 7: Managing the Wider Environment Para. 7.10-7.11.2 Policy E7.3 East Capellie, Neilston	
Planning authority's summary of the representation(s):		
<p><u>(a) Policy E7: Waste Management</u></p> <p><u>Support</u></p> <p><u>Nazir Ahmed (Ref 755/38)</u> - Support policy</p> <p><u>Objection</u></p> <p><u>James Whyteside (Ref 82/16)</u> - Suggestion that small-scale energy from waste would be permissible would give Lifetime Recycling Village an opening to begin development. Technology is far from safe.</p> <p><u>(b) Policy E7.3 East Capellie, Neilston</u></p> <p><u>Objection</u></p> <p><u>SEPA (Ref 70/55)</u> - Assessment of flood risk required.</p>		
Modifications sought by those submitting representations:		
<p><u>(a) Policy E7: Waste Management</u></p> <p><u>James Whyteside (Ref 82/16)</u> - Delete small-scale energy from waste from policy.</p> <p><u>(b) Policy E7.3 East Capellie, Neilston</u></p> <p><u>SEPA (Ref 70/55)</u> - Flood Risk Assessment required.</p>		

Summary of responses (including reasons) by planning authority:**(a) Policy E7: Waste Management****Support****Nazir Ahmed (Ref 755/38)**

The Council acknowledges and welcomes the support for Policy E7.

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

Objection**James Whyteside (Ref 82/16)**

The Council is required by Scottish Planning Policy (SPP) (CD/69) to facilitate sustainable development, an element of which is support for sustainable waste management. A key principle is the proximity principle that waste is dealt with as close as is possible to where it is produced.

It is considered that the criteria set out in this policy, including the case of small scale waste management facilities, are appropriate.

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

(b) Policy E7.3 East Capellie, Neilston**Objection****SEPA (Ref 70/55)**

This is a long established waste management facility with planning consent.

When viewed against SEPA Indicative Flood Risk Map, it is noted that this site does not fall within an identified area and therefore a Flood Risk assessment would not be required. Sections 7.4 – 7.7 and Policies E3: Water Environment, E4: Flooding and E5: Surface Water Drainage and Water Quality of the LDP adequately address the water environment requirements of all development proposals.

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

Reporter's conclusions:**Policy E7: Waste Management**

1. Scottish Planning Policy sets out policy principles, including that the planning system should help deliver waste management infrastructure at appropriate locations, prioritising development in line with the waste hierarchy: waste prevention, reuse, recycling, energy recovery and waste disposal (paragraph 176). The planning system should support the provision of a network of infrastructure to allow Scotland's waste and secondary resources to be managed in one of the nearest appropriate installations, by means of the most appropriate methods and technologies (paragraph 182). The principle of small-scale facilities providing energy from waste and located close to the source of waste is therefore supported by national policy. Policy E7 of the proposed plan requires such

facilities to be accommodated without detriment to residential or environmental amenity, and not to be in proximity to a potentially conflicting use. Installations are also subject to regulation by the Scottish Environment Protection Agency. I consider that there are sufficient safeguards in place to ensure that safety and environmental quality are not compromised, and I do not accept that the proposed plan should be modified in line with Mr Whyteside's representation.

Policy E7.3 East Capellie, Neilston

2. East Capellie is an operational landfill site. The Scottish Environment Protection Agency flood map shows that small areas on the access road and on the northern fringe of the site are at risk of surface water flooding with an annual probability of 0.5 percent (1 in 200 years) or greater. Any flooding would be very localised and can be controlled as part of the site management regime. There is no need to modify the plan so as to require a flood risk assessment.

Reporter's recommendations:

No modifications.

Issue 17	TECHNICAL DOCUMENTS	
Development plan reference:	Para1.9 Accompanying Documents	Reporter: Michael Cunliffe
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>SEPA (Ref 70/5) Scottish Natural Heritage (Ref 88/14) Scottish Water (Ref 256/9) (Ref 256/10) Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/6) (Ref 463/7) Glasgow Jewish Representative Council (Ref 722/1) Historic Scotland (Ref 961/2) Scottish Natural Heritage (Ref 964/2) SPT (Ref 969/6) (Ref 969/7)</p>		
Provision of the development plan to which the issue relates:	Technical Documents: Action Programme Equalities and Human Rights Impact Assessment Monitoring Statement Strategic Environmental Assessment Schedule of Council Land Ownership	
Planning authority's summary of the representation(s):		
<p><u>(a) Action Programme</u></p> <p><u>Support</u></p> <p><u>Scottish Natural Heritage (Ref 88/14)</u> - We welcome the format and detailed information contained in the Action Programme and we are happy to be included as a key partner in all the Actions that we are listed against. We particularly welcome the commitments within the Action programme for the delivery of the masterplan sites and the direction to include Green Infrastructure and the Green Network within the masterplan sites. We believe the masterplan sites offer a real opportunity to plan and deliver development which are place-based and that make a positive contribution to enhancing the wider East Renfrewshire Green Network.</p> <p><u>General</u></p> <p><u>Scottish Water (Ref 256/10)</u> - Chapter 4- Partnership working. As a key agency, Scottish Water will continue to participate in the bi-annual review meetings with the key officers at East Renfrewshire Council and support the outcomes of the action programme where appropriate.</p> <p><u>SPT (Ref 969/6)</u> Consider if plan should define short term timescales more closely, many timescales are out of first two years/ life of the Action Plan A number of transport actions may not be completed in 2 year period SPT supports the need for an annual meeting of a Developers Forum to include Key</p>		

Agencies as referenced in Paragraph 1.1.11 and a bi-annual meeting of Key Agencies referenced in Paragraph 4.1.3.

Page 17 Barrhead South: It is expected that the development of a sustainable transport strategy will include the investigation of new and extended bus services as well as a possible rail station ("halt").

Page 56 Sustainable Transport Network: We note there is no specific reference to a process for monitoring and enforcing Travel Plans in the Actions and consider that this would be helpful.

Page 89 Sustainable transport core paths and walking cycling: SPT has approved significant funding for East Renfrewshire in the current Capital Plan (2013/14 to 2015/16) for pedestrian and cycling improvements.

Page 90 Rail Station at Springfield, Barrhead: SPT has previously provided funding to East Renfrewshire to consider transport opportunities for Springfield and will continue to provide technical expertise as required.

However any decision on progressing with a new rail station would be for Transport Scotland.

Page 91 Neilston Park and Ride: SPT has already approved significant funding for East Renfrewshire in the current Capital Plan (2013/14 to 2015/16) for additional parking spaces.

(b) Equalities and Human Rights Impact Assessment

Objection

Glasgow Jewish Representative Council (Ref 722/1)

Disappointment & concern (no specific consultation taken place with individuals or organisations representing Jewish Community) and that the EQIA method & conclusion showed a 'Neutral Impact on Religious & Race Groups' in relation to ERC Proposed Local Development Plan.

Needs to recognise that half/75% of Scotland's Jewish population live in East Renfrewshire, the SOA does to some extent under 'Promoting Inclusion'.

(c) Monitoring Statement

General

Scottish Water (Ref 256/9)

1.8 Infrastructure Capacity

Scottish Water acknowledges that in some areas the capacity at our treatment works and within our existing network is insufficient to accommodate additional development without network reinforcement. Should there be insufficient capacity for development at our Water or Wastewater Treatment Works (Part 4 Assets) Scottish Water will provide additional capacity if the Developer meets the following criteria:

1. The development is supported in the Local Development Plan and has full planning permission. If the capacity in the Scottish Water system is the only reason preventing a development gaining full planning then outline planning would be accepted.
2. The developer confirms land ownership or site control through a solicitor's letter.
3. The developer can confirm plans are in place to mitigate any network constraints that will be created by the development through a Minute of Agreement with us or alternatively, a letter showing commitment to mitigate the network impact through Part 3 investment.

4. The developer confirms any time remaining on current planning permissions with the local council.

5. The developer can demonstrate reasonable proposals in terms of the development's annual build out rate.

On receipt of these criteria Scottish Water will instigate a growth project to provide Part 4 capacity for development. Scottish Water will also work with SEPA, the Developer and the Local Authority to identify solutions to enable development to proceed.

SPT (Ref 969/7)

Table 1 - reference to "explore and review the need for possible rail stations ("halts") at Barrhead South" should be taken forward in such a way that rail is considered as one of a number of different transport options that could meet travel needs.

We note the removal of reference to a station at Uplawmoor.

Note that Appendix H4 usefully includes technical information on accessibility provided by SPT and agree that additional Park and Ride facilities may be required.

Table H4.5 notes that a Barrhead to M77 Link Road is no longer appropriate and the Plan references more modest proposals.

Objection

Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/6) - Monitoring Statement Para 2.2.3 confirms SDP does not provide for any strategic economic investment in East Renfrewshire, Para 2.2.6 sets out dropping of Pollock Ryatt site, importance of Green Belt and flexibility required to address short term delivery issues without reference back to main plan text. It is not clear how these issues have been addressed in main plan.

(d) Strategic Environmental Assessment

Support

SEPA (Ref 70/5)

pleased to note issues raised 24 June 2011 have been addressed

Welcome the emphasis on Brownfield redevelopment with associated environmental benefits

Agree that providing masterplans for proposed developments in the Green Belt can provide some mitigation for the inevitable negative environmental impacts

Very much welcome the acknowledgement of the importance of green infrastructure and green networks

Support the proposal to SEA SPGs

Table 3 'Summary of Assessments' is comprehensive

Generally agree with mitigation proposals set out in sections 6.4 to 6.8

Generally agree with environmental objectives set out in Appendix 2, but suggest Objective 5 could be strengthened.

Historic Scotland (Ref 961/2)

Welcome the preparation of this revised Environmental Report and consider it clearly presents the potential environmental effects of the plan. I agree with the findings presented within the report and welcome the mitigation identified in relation to the policies and proposals and their potential effects on the historic environment resource.

The recognition of the need for any Supplementary Planning Guidance not covered by this Environmental Report to be subject to their own SEA process is welcomed.

General**Scottish Natural Heritage (Ref 964/2)**

In general, SNH notes that following some of the comments we made in response to the SEA at the Main Issues Report stage, this current version appears to be presented in a much easier to follow and coherent manner.

The principle issue we would wish to raise with the planning authority regarding the current SEA is that while it is notable how many proposals in the proposed plan are now assessed as requiring mitigation in order for their environmental impacts to be acceptable, it is not always clear how this identified requirement has influenced the policies in the plan itself in order to ensure that the necessary mitigation is achieved. In many areas it will therefore fall to the master planning process to ensure that development is taken forward in an acceptable manner. As such SNH would be keen to work with East Renfrewshire Council on the development of these master plans.

No apparent mention of the recently completed SINC review process

Green spaces and the Green Belt are mentioned, though not East Renfrewshire's contribution to the wider CSGN

SNH would suggest that the ideal way to assess the current state of East Renfrewshire's (or indeed any local authority's) biodiversity would have been to consider the status and trends of the priority habitats and species in the Local Biodiversity Action Plan

It is also worth noting that little if any mention is made of the local landscape character of East Renfrewshire. Yet this aspect of the local authority area's environment has in fact been central to some of the advice SNH has provided in response to specific development consultations in recent years.

SNH notes that the great majority of individual allocations and/or proposals made subject to SEA are assessed as requiring mitigation. However it is not always clear how this identified need for mitigation has led to identifiable policies or hooks in the proposed LDP itself that will achieve such mitigation and allow the environmental impacts of the proposed development to become acceptable. It will thus fall largely to the master planning process to mitigate negative impacts in the areas where it is applied. SNH would therefore be pleased to work with East Renfrewshire Council in the development of these master plans when the time comes.

Objection**Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/7)**

With reference to M2/M2.1:

SEA contains no assessment of reasonable alternatives and contains no justification for scale of land release

Only puts forward masterplanning as mitigation for negative effects of Green Belt loss.

This not objective.

(e) Schedule of Council land Ownership**Objection****Jim Sheriff (Ref 892/3)**

Kingston Playing Fields and Brig O'Lea Stadium omitted from Schedule of Council land Ownership Document

Modifications sought by those submitting representations:**(a) Action Programme**

Scottish Natural Heritage (Ref 88/14) - Under "SG3 Phasing of new housing development"; we recommend that, in order to maintain a high amenity value, it states that the council will work with the development industry on intermediate or stalled sites to encourage temporary or advanced greening.

SPT (Ref 969/6)

Consider if plan should define short term timescales more closely, many timescales are out of first two years/life of the Action Plan.

Page 17 Barrhead South: It is expected that the development of a sustainable transport strategy will include the investigation of new and extended bus services as well as a possible rail station ("halt").

Page 56 Sustainable Transport Network: no specific reference to a process for monitoring and enforcing Travel Plans in the Actions and consider that this would be helpful.

Page 89 Sustainable transport core paths and walking cycling: SPT has approved significant funding for East Renfrewshire in the current Capital Plan (2013/14 to 2015/16) for pedestrian and cycling improvements.

Page 90 Rail Station at Springfield, Barrhead: SPT has previously provided funding to East Renfrewshire to consider transport opportunities for Springfield and will continue to provide technical expertise as required.

Page 91 Neilston Park and Ride: SPT has already approved significant funding for East Renfrewshire in the current Capital Plan (2013/14 to 2015/16) for additional parking spaces.

(b) Equalities and Human Rights Impact Assessment

Glasgow Jewish Representative Council (Ref 722/1) - Equalities and Human Rights Impact Assessment should include references to Jewish community.

(c) Monitoring Statement

Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/6) - Plan should clearly show how SDP requirements and provisions are addressed.

(d) Strategic Environmental Assessment

SEPA (Ref 70/5) - Objective 5 could be strengthened with reference to overall improvement of water conditions rather than minimising, Objective 7 could aspire to overall decrease in flooding.

Scottish Natural Heritage (Ref 964/2)

No apparent mention of the recently completed SINC review process.

East Renfrewshire's contribution to the wider CSGN not mentioned.

Ideal way to assess the current state of East Renfrewshire's biodiversity would have been to consider the status and trends of the priority habitats and species in the Local Biodiversity Action Plan.

Little mention is made of the local landscape character of East Renfrewshire.

It is not always clear how identified need for mitigation has led to identifiable policies or hooks in the proposed LDP itself that will achieve such mitigation and allow the

environmental impacts of the proposed development to become acceptable.

Objection

Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/7) - With reference to M2/M2.1:SEA should include assessment of reasonable alternatives and justification for scale of land release.

(e) Schedule of Council land Ownership

Jim Sheriff (Ref 892/3) - Kingston Playing Fields and Brig O'Lea Stadium should be added to Schedule of Council land Ownership Document

Summary of responses (including reasons) by planning authority:

(a) Action Programme (CD/07)

Support

Scottish Natural Heritage (Ref 88/14)

The Council welcomes the supportive comments in relation the information presented and layout of the Action Programme. The Council also acknowledge the commitment to involvement to the Masterplan process and associated application of the Green Infrastructure and Network.

SNH also suggested revised wording for Policy SG3 regarding temporary greening on stalled sites. This matter is adequately addressed under Strategic Policy 2 criteria 10 and the Green Network and Environmental Management SPG.

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

General

Scottish Water (Ref 256/10)

The Council welcomes Scottish Water's continued commitment to working in partnership with the Council and particularly through bi-annual review meetings.

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

SPT (Ref 969/6)

The Council appreciates that by nature the Action Programme is a snap-shot in time and that for various reasons timescales can change. The action programme will be reviewed and updated on an on-going basis with formal publication every two years as required by planning regulations. The action programme is considered a live document which will adapt to changing circumstances.

Note the detailed comments in relation to certain projects. Timeframes have been consistently referenced throughout the document as follows Short-term (0-5 yrs.), Medium Term (5-10 yrs.), Long-term (10+ yrs.), these time frames are referenced throughout the Action Programme. Consequently there is a reasonable degree of flexibility in relation to timeframes, for instance projects which are considered to be completed in excess of 2 years would still be considered as short- term.

Continued support for both bi-annual meetings with Key agencies and participation in the

Developers Forum acknowledged and welcomed.

Bus and rail transport options are integral to a Sustainable Transport Strategy for Barrhead South. This issue is further addressed under Issue 3.4 and the Development Framework (CD/23).

The process of monitoring and enforcement of Travel Plans will continue to be investigated.

The approval by SPT of significant funding for core paths, walking & cycling is acknowledged, welcomed and appreciated.

The Council acknowledge the commitment of funding by SPT in relation to transport opportunities at Springfield, Barrhead. However it is acknowledged that the ultimate decision on progression of a Rail Halt is a matter for Transport Scotland and Network Rail.

The SPT approval of significant funding for Neilston Park & Ride is acknowledged, welcomed and appreciated. This site now has the benefit of planning consent.

The Action Programme will be updated to reflect current project timescales and resources.

(b) Equalities and Human Rights Impact Assessment (EQ&HRI) (CD/11)

Objection

Glasgow Jewish Representative Council (Ref 722/1)

The timeframe for consultation on (EQ&HRI) necessitated that it be undertaken in tandem with the consultation on the Proposed LDP.

The contacts section of the 2014 Development Plan Scheme (CD/52) will be updated to take into account new interested groups such as the Glasgow Jewish Representative Council who previously have not submitted representations to the Plan.

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

(c) Monitoring Statement (CD/08)

General

Scottish Water (Ref 256/9)

It is clear that Scottish Water is funded to provide upgrades at treatment works where the 5 growth criteria have been met. Lack of capacity should not be seen as a barrier to development. The Council will continue to work in close partnership with Scottish Water through the preparation of the LDP and Development Management process.

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

SPT (Ref 969/7)

Bus and rail transport options are integral to a Sustainable Transport Strategy for Barrhead South. This issue is further addressed under Issue 3.4 and the Development

Framework.

The recognition of the comments on the removal and the scale of certain proposals are acknowledged.

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

Objection

Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/6)

Acknowledge the statement of fact that the Approved Strategic Development Plan (SDP) does not contain a Strategic Economic Investment Location (SEIL) within East Renfrewshire and that the High Amenity Site at Pollock Ryatt is no longer a site identified in the national interest. The High Amenity Site at Pollock Ryatt was previously safeguarded as a direct result of SPP and subsequent Structure Plan policy. This is no longer the case. The High Amenity Designation was removed in preparation of the Proposed Plan.

Each of the levels of the strategic policy framework are summarised under Para 1.5 to 1.6 of the Plan and Appendix A of the Monitoring Statement. The Plan and Monitoring Statement clearly demonstrate compliance with the SDP and how strategic issues are addressed.

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

(d) Strategic Environmental Assessment (CD/06)

Support

SEPA (Ref 70/5), Historic Scotland (Ref 961/2)

The Council acknowledges and welcomes the support for the SEA.

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

General

Scottish Natural Heritage (Ref 964/2)

The Council welcomes the comments on how the SEA has evolved positively since MIR stage.

Preparation of the Development Frameworks have benefitted from close liaison with SNH and been closely informed by the SEA in consideration of and provision of evidence of mitigation. Points of detailed response include:-

The Review of SINC's was just being finalised at time of writing SEA.

Noted and agreed that further connection with Central Scotland Green Network (CSGN) could have been made and will be incorporated within future SEA's.

Agreed that the trends for priority habitats & species within the LBAP could have linked to SEA, this will remain a challenge in the absence of a Bio-Diversity Officer.

Noted that reference to Local Landscape character can be made more explicit within future SEA's.

Further SEA's will be informed by these comments.

Objection**Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/7)**

The SEA undertaken at MIR stage and the various Site Evaluation assessments and green belt reviews have all considered a range of sites. The results of these studies have informed the selection of preferred sites for the Proposed Plan. All potential options have therefore been carefully considered.

The SEA assesses the sites put forward within the Proposed Plan. It is not for the SEA to provide justification for the sites being assessed - this is provided for within the Proposed Plan.

Master plans have incorporated the points raised within the SEA and provided evidence that issues were considered and mitigation provided.

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

(e) Schedule of Council Land Ownership**Jim Sheriff (Ref 892/3)**

The Council agrees with this representation.

If the Reporter is so minded the Council would be supportive of this document being updated to refer to Kingston Playing Fields.

Reporter's conclusions:

1. These representations relate to documents which accompany, but do not form part of, the proposed local development plan. I have no remit to recommend changes to these documents. I have considered whether any of the representations would warrant changes to the proposed plan itself, and have concluded that they would not.
2. In particular, I have had regard to the objections by Ian Kelly, Graham+Sibbald on behalf of Save the East Renfrewshire Green Belt (Newton Mearns) (Ref 463/6). These relate to the Monitoring Statement and the Strategic Environmental Assessment. Under Issue 1 I have dealt with the relationship between the proposed plan and the Glasgow and Clyde Valley Strategic Development Plan. I concluded that there is no need for additional details and information regarding the strategic development plan to be included in the proposed plan. As regards the environmental assessment and the consideration given to alternatives, I agree with the council that the process of preparing the proposed plan has given full consideration to a range of potential options and their environmental effects.
3. I note the undertakings by the council to update the Action Programme to reflect current transport project timescales and resources; to take account of the comments by Scottish Natural Heritage in future Strategic Environmental Assessments; and to update the Schedule of Council Land Ownership in line with Mr Sheriff's representation.

Reporter's recommendations:

No modifications.