

REPORT TO RENFREWSHIRE COUNCIL

RENFREWSHIRE LOCAL DEVELOPMENT PLAN EXAMINATION

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LDP-350-1 Renfrewshire LDP Examination

Examination of conformity with the participation statement

1. Section 19(4) of the Town and Country Planning (Scotland) Act 1997, as amended (the Act), states that a 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 with the public at large as respects the proposed plan have conformed with (or have been beyond the requirements of) the consultation statement of the authority which was current when the proposed plan was published under section 18(1)(a).”
2. Renfrewshire Local Development Plan Participation Statement was published as part of the planning authority’s Development Plan Scheme, prepared to conform with section 20B of the Act. Four versions of the scheme were published, annually from 2009 and ending in November 2012. Each contained updated information on progress and timescales. Once approved by the council they were posted on the council’s website and paper copies distributed to libraries and the Scottish Government. Each contains a copy of the participation statement.
3. The participation statement sought effective engagement to ensure that all who wish to could discuss issues and proposals. Five stages were set out for gathering views, comments and opinions before submission of the plan to Scottish Ministers. These were:
 1. The annual Development Plan Scheme to be available in public libraries and on the council’s website;
 2. A Pre Main Issues Report to be placed on a dedicated Local Development Plan web page, to be followed by: an online consultation questionnaire for suggestions for land use change; meetings with key agencies; Public Services Panel focus group questionnaire and workshop groups; presentation and training for councillors, Community Planning Partnership and local area committees; and a stakeholder conference.
 3. A main issues report, environmental report and monitoring statement, to be advertised in the press and a copy to be placed in public libraries and at Renfrewshire House. Consultation to be available on the web with an electronic form for representations. Neighbouring authorities, key agencies and community councils to be notified. Meetings to be held with local interest groups, community councils, council staff and services and community planning partners. Presentations to be given to local area committees, community planning partnership groups and other interested groups.
 4. The proposed plan and environmental report to be published, deposited at libraries, advertised in the local press and added to the web pages. Owners, lessees and occupiers of sites and neighbouring sites to be notified. Anyone else on the consultation database or who commented on the Main Issues Report to be notified. Meetings and presentations as stage 3.
 5. Any modifications proposed are to be published, publicised and consulted on as stage 4. The report is then to be submitted to the Scottish Ministers.

4. The Report of Conformity with the Participation Statement, published in 2013, was submitted to Ministers along with the proposed plan, in accordance with section 18(4)(a)(i) of the Act. It describes what has been done to fulfil the participation aims set out above. The report concludes that the council has complied with the participation statement included in the development plan scheme at the time the proposed plan was published. In addition to the statutory requirements, the council hosted a charette exercise, focus groups, two large stakeholder events and numerous additional meetings and presentations to explain and encourage consultees to engage in the process.
5. The statement of conformity records the publication of the annual updating of the Development Plan Scheme. It sets out in detail the methods and events used in engagement and illustrates a comprehensive chronology up until the end of the consultation stage of the proposed plan. The council also undertook a five day charette exercise in relation to the selection of Johnstone South West under the second phase of the Scottish Sustainable Communities Initiative. This helped to refine the masterplan and development framework for the area.
6. Some representations to the proposed plan refer to the lack of engagement with those affected and the limited notification of neighbours. However, the council appears to have done what it set out to do and has complied with the legal requirements. We are unaware of any other representations being made about the participation statement or the consultation and public involvement activities, either to the council or direct to Scottish Ministers.
7. Having considered all the evidence, we find that the authority has consulted on the plan and involved the public at least in a way it said it would in its participation statement, published in accordance with section 18(1)(a) of the Act. Being satisfied, we therefore proceed to examine the proposed plan.

Dannie Onn Karen Heywood Phil Hutchinson Ron Jackson

Issue 1	Spatial Strategy	
Development plan reference:	Pages 6 & 7	Reporter: Dannie Onn
Body or person(s) submitting a representation raising the issue (including reference number):		
RSPB (183) Persimmon Homes (West) Scotland (186) James Henderson (266) Paisley West & Central Community Council (345) Ian Wallace (426) Lyndsey McGill (486) Mactaggart & Mickel (1801) Peter J Dixon (1816) Ann & John Cameron (1823) David & Helen Robertson (1834) E. McWaters (1839) Ronald C. McGuire & Margaret McGuire (1855)		William Armstrong & Family (1858) Alfano Brothers Retirement Scheme (1860) Peter & Marion Kelt (1871) Mr and Mrs Gallagher (1873) Intu Properties Ltd (1967) Pamela Sloan (2063) MEPC (2081) Homes for Scotland (2085) AWG Property Ltd / CEMEX UK Property (2094) David Wilson Homes (2095) Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112) CALA Homes (West) (2114)
Provision of the development plan to which the issue relates:	Sets out the vision and spatial development strategy for the plan.	
Planning authority's summary of the representation(s):		
<p>Support for Spatial Strategy</p> <p><u>RSPB (183)</u></p> <p>Support of the objectives set out in delivering the environment strategy.</p> <p><u>Mactaggart & Mickel (1801)</u></p> <p>Support the intention that sustainability should be placed at the heart of the spatial strategy.</p> <p><u>Alfano Brothers Retirement Scheme (1860)</u></p> <p>Identifying brownfield sites and concentrating on regeneration and reuse of vacant and derelict land is welcomed.</p> <p>Implementing the Spatial Strategy</p> <p><u>Intu Properties Ltd (1967)</u></p> <p>A seventh criterion should be added to the list of factors to be taken into account when</p>		

giving support for new development; they should need to contribute positively to the economy and/or regeneration.

Economic Strategy

MEPC (2081)

Welcomes the fact that the principles of the spatial strategy will aim to be secured through each new development proposal. However concern is raised regarding the design aspects related to height, scale and massing as stated within bullet point 3 in 'Implementing the Spatial Strategy' (page 6) that are considered inflexible and put at risk innovation as well as the potentially stifling the delivery of landmark buildings, which could stimulate the economy.

Paisley West & Central Community Council (345)

It is necessary to have a range of office and factory floor space. However there is no indication how building them will draw employers to the area. There is also no indication of any specific industries or services that the Council wishes to attract or support their development. There is little indication of Council collaboration with the private sector in the development of economic activities. There are thousands of small and medium enterprises within Renfrewshire, but there is no indication how these could be supported to develop further profitable companies, increase employment and tax revenue which could in turn lead to lower unemployment and reduced deprivation.

There should be support for the number of small development sites that have been identified because these could be developed by local builders, thereby keeping expenditure and revenue within the local economy. It would also complete gaps sites, improving amenity and reducing the need to consider green belt sites. The use of green belt sites is at odds with the Council's strategic aims of greener and healthier as well as the promotion of a low carbon economy and climate change challenges.

David Wilson Homes (2095)

The Economic Strategy within the LDP should make clear the contribution to the local economy made by house building.

Places Strategy

Pamela Sloan (2063)

Renfrewshire Council needs to double its efforts to the promotion and marketing of brownfield sites before embarking onto greenfield sites. Renfrew has been developed to an inch of her life and would struggle to support further development. Rather than creating a sense of place, concrete jungles are being created with a lack of quality green/open spaces for the community to enjoy.

James Henderson (266), Ian Wallace (426), Lyndsey McGill (486), Peter J Dixon (1816), Ann & John Cameron (1823), David & Helen Robertson (1834), E. McWaters (1839), Ronald C. McGuire & Margaret McGuire (1855), William Armstrong & Family (1858)

This Plan undermines the policy of redeveloping cleared urban brownfield sites rather

than building on greenfield ones; more emphasis should be placed on building on this. The loss of green belt should only be considered once all brownfield sites have been built on. There are many brownfield, derelict parts of urban areas that urgently need regeneration or redevelopment and although potential developers prefer greenfield sites, they should be driven to use up brownfield sites first. Greenfield development is completely contrary to encouraging sustainable urban living close to existing services and facilities and fully integrated into the community.

Peter & Marion Kelt (1871), Mr and Mrs Gallagher (1873)

There are plenty other locations and brownfield sites, by the A737, not near the villages and homes which should be used for development rather than greenfield sites.

David Wilson Homes (2095)

Disagree that brownfield land will provide sufficient land to accommodate Renfrewshire's developments. This strategy is unrealistic. Brownfield sites, by their very nature, are more problematic than greenfield and are subject to constraints in terms of historical uses or higher land values.

Homes for Scotland (2085)

The Plan's focus on the need to retain and attract people is likely to fail. If the council is serious about attracting quality employment and the people to work in the local economy, then opportunities for housing across the range of the markets is required, including those in the most marketable locations. There is no evidence of any consideration of how appropriate levels of growth in smaller settlements can be a contribution to sustaining and improving their amenity and services.

The LDP rightly states that there is no justification for an affordable housing policy. The land identified to deliver affordable housing units appears to be concentrated in the larger urban areas. The areas of highest house prices and highest demands might reasonably be assumed to be areas where some affordable housing provision would be desirable and if there is little or no land allocated within these areas, then affordable housing will not be delivered there.

Persimmon Homes (West) Scotland (186), Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112), CALA Homes (West) (2114)

It is agreed that there needs to be a proactive approach to delivery and that development locations require to be supported by existing or planned infrastructure. However there is concern that the spatial strategy restricts most of its future land releases to brownfield sites. Greenfield housing sites promoted during the LDP process are largely ignored. The LDP needs to be able to support approvals on additional land to ensure its development strategy can continue to support future land releases. The present strategy is too dependent on the promotion of brownfield sites and is high risk, more greenfield sites require to be identified. The strategy is too restrictive, lacks spatial guidance and needs to direct future growth to the most sustainable areas. The spatial strategy does not maximise opportunities for sustainable development on greenfield sites located in close proximity to existing strategic economic development commitments, the M8 and Bishopton CGA. The area between Bishopton, Renfrew and Braehead, as indicated in the plan provided as part of the representation, is a highly sustainable area which is where

the Council should be focusing future growth, rather than the Paisley South Expansion Area which is on the periphery and disconnected from the strategic investment area.

AWG Property Ltd / CEMEX UK Property (2094)

Support the LDP strategy that in order to deliver a sufficient number of new housing units within the short term, there is a requirement to identify a number of small sites with limited constraints on the edge of settlements to provide a range and choice of sites. However concerned that there is no allocations identified in Kilbarchan.

Delivery of the Spatial Strategy

Paisley West & Central Community Council (345)

It is difficult to identify from the Proposed LDP and the Action Programme (CD/01) what the council actually intends to deliver, there are few measurable targets, with little indication of how it will be funded.

Modifications sought by those submitting representations:

Suggest that the following point is added to the grey box 'Implementing the Spatial Strategy', (page 6), *'The development will contribute positively to economic regeneration, job creation and/or urban regeneration.'*

Recommend greater flexibility is introduced in bullet point 3 in 'Implementing the Spatial Strategy' (page 6), adding the sentence *'Development that is innovative and creative will also be supported.'* (2081)

More emphasis on building on brownfield sites rather than greenfield. (266, 345, 426, 486, 1816, 1823, 1834, 1835, 1839, 1858, 1855, 1871, 1873, 2063)

The LDP should state that redevelopment of brownfield land will be supported however this will require to be supplemented by a range of new greenfield opportunities in sustainable and marketable locations, which can make use of existing services and infrastructure. (2095)

The following additional text should be added to page 6 of the LDP to describe the spatial strategy: 'The spatial strategy demonstrated in Figure 4, indicating Renfrewshire's key components of the national and SDP (CD/02) vision and spatial strategy such as the green network, Clyde Waterfront and the Community Growth Areas of Bishopton and Johnstone South West, showing the consolidation of development within existing built up areas, adhering to the principles of sustainable development.'

'The Council will support greenfield development within Strategic Investment Areas where it promotes sustainable economic growth at these strategic economic investment locations and if it assists in maintaining a 5 year effective housing land supply at all times.' (186, 2112, 2114)

Include site at Barrhill Crescent, Kilbarchan (Ref. 2240) as a residential development for up to 75 units. (2094)

Additional housing allocations require to be identified to provide a range and choice of

housing. The sites should be edge of settlement, greenfield and in a wider range of settlements including the rural villages. (2085)

Summary of responses (including reasons) by planning authority:

Support for Spatial Strategy (183, 1801,1860)

Supported is noted and welcomed.

Implementing the Spatial Strategy (1967)

The aims and objectives of the Renfrewshire Local Development Plan (LDP) Spatial Strategy is to promote and support sustainable economic growth, investment, regeneration, etc and this is clearly outlined in the text on page 6 of the proposed LDP. The grey box 'Implementing the Spatial Strategy' on page 6 is intended to provide some high level design criteria which will apply to all developments. Therefore to specifically mention economic regeneration, job creation and regeneration in this section of the plan is inappropriate. The Council therefore reject the changes suggested by the respondent.

Economic Strategy

MEPC (2081)

Throughout the LDP and the New Development Supplementary Guidance there are criteria and guidance looking to achieve the most appropriate design solution for new development. The aim is to retain and attract people to Renfrewshire by improving places, offering an attractive environment. Innovative design as well as individuality is encouraged in particular where it would stimulate the economy, leading to further investment in an area. The bullet points on page 6 of the proposed LDP simply provide some basic principles. It is considered that there is no need to alter the wording as the proposed LDP does not prevent innovation.

Paisley West & Central Community Council (345)

It is considered that Figure 6 – Renfrewshire's Economic Investment Locations outlines the types of uses and the potential economic opportunities for the Strategic Economic Investment Locations. The LDP Action Programme (CD/01) details how the council propose to implement the economic strategy and the partners that will be required to lead or support this delivery.

The proposed LDP is required to identify a range and choice of development sites across Renfrewshire to encourage growth and investment. This has meant the need to identify some greenfield sites to allow expansion to facilitate sustainable economic growth. It is considered that this complies with Scottish Planning Policy (CD/03) in that the proposed LDP directs growth to the right locations.

David Wilson Homes (2095)

The importance of the investment and the contribution that house building makes to the economy is specifically outlined within the Places section of the proposed LDP, which we considered is the most appropriate location for this statement. However promoting development activity and investment is a theme carried throughout the proposed LDP in

an aim to deliver sustainable economic growth within Renfrewshire. Therefore we see no requirement to have an additional statement regarding house building's contribution.

Places Strategy

Pamela Sloan (2063)

The overall strategy promoted throughout the proposed LDP is to focus on creating high quality communities and places using previously developed sites, with an emphasis on trying to reduce the level of vacant and derelict land. It is recognised in the proposed LDP that this has to be balanced with ensuring that the environmental assets are also retained and enhanced. It is considered that this point is well made in the proposed LDP and requires no additional policies or text.

James Henderson (266), Ian Wallace (426), Lyndsey McGill (486), Peter J Dixon (1816), Ann & John Cameron (1823), David & Helen Robertson (1834), E. McWaters (1839), Ronald C. McGuire & Margaret McGuire (1855), William Armstrong & Family (1858)

As outlined above the emphasis of this proposed LDP is that brownfield sites in sustainable locations will contribute towards a large amount of Renfrewshire's development land. However in order to enable and support sustainable economic growth and set a framework to accord with the Strategic Development Plan (CD/02), in pursuing a optimistic growth scenario as well as addressing the need and demand set out in the housing land requirements, the proposed LDP identifies green belt land to meet the overall land requirements for the LDP.

Within the LDP Action Programme (CD/01) there are various outcomes and partnership mechanisms to help support and deliver development on brownfield land. We would disagree that the proposed LDP requires more emphasis on brownfield development than green belt as this is the main focus throughout the proposed LDP.

Peter & Marion Kelt (1871), Mr and Mrs Gallagher (1873)

It is agreed that there are a number of development sites close to existing road networks and the proposed LDP aims to promote sites which have good access and are located in close proximity to a range of walking, cycling and public transport networks as well as the road network. However in order to provide a range and choice of sites across Renfrewshire, there was a need to identify sites in and around the villages, which could be considered less sustainable than the more urban areas, but allow for the need to met across Renfrewshire.

David Wilson Homes (2095)

The strategy in the proposed LDP is to focus on previously used sites due to these being considered as the most sustainable sites and are, primarily within existing built up areas. In accordance with national and strategic policy and guidance, making efficient and responsible use of land, environmental and other physical resources and infrastructure would direct the development focus to most of our brownfield sites. Not all brownfield sites could be said to be more problematic than greenfield. In many cases, brownfield sites are only constrained by the existing economic circumstances. This is the reason for identifying Housing Action Programme sites where the council are looking to support and enable development where possible. The council considers that many of these brownfield

sites are still part of the land supply within Renfrewshire and actions require to be taken to regenerate and create better places as well as providing sufficient land to meet the housing need and demand.

Homes for Scotland (2085)

The proposed LDP provides development sites for housing in the most marketable locations. Providing more land in desirable locations which are less sustainable would have a negative impact on the aim of trying to lower emissions and consolidate development which is well served by existing infrastructure. The balance between sustaining and improving facilities and services in an area by adding an appropriate level of growth has to be weighed up against the factors that make these settlements assets to Renfrewshire. Protecting and enhancing the quality of natural and built environments is also important and therefore this is the reason that the proposed LDP identifies the level of growth in the smaller settlements that it currently does.

The proposed LDP does not identify specific sites to deliver the required affordable housing requirement. The proposed LDP identifies an all tenure land supply. Renfrewshire has been successful in delivering a sufficient supply of affordable units in a range of locations through a successful Strategic Housing Investment Plan (CD/04) and other additional government funding mechanisms. Although it is accepted that there is a small need for affordable units within west Renfrewshire, the proposed LDP aims to be as flexible as possible and therefore not constraining particular sites or developments to a particular tenure. We consider the correct approach has been taken in the proposed LDP.

Persimmon Homes (West) Scotland (186), Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112), CALA Homes (West) (2114)

We would disagree that the green belt housing sites submitted for consideration in the LDP process were largely ignored. At the Main Issues Report (CD/05) stage of the development plan process there was an extensive assessment carried out through a land use consideration planning sustainability assessment (CD/06), strategic environmental assessment (CD/07) and a landscape assessment (CD/08) for each site that was either in the existing land supply or had been suggested as new sites. Once the need and demand had been finalised, this assessment information along with additional information submitted throughout the process was assessed and those sites that were considered to achieve the right development in the right place were identified for allocation in the proposed LDP. Although brownfield sites may be considered to be higher risk than greenfield, the Council recognises that a proactive approach to helping these harder to develop sites, promotes a more holistic approach to creating places which provide opportunities for all not just those in the most marketable locations. The area indicated in the proposed LDP submitted by the respondent, Southbar in Erskine is covered in Issue 28, providing in detail the reason why this site was not chosen as part of the development framework for the proposed LDP.

AWG Property Ltd/CEMEX UK Property (2094)

The reason for not considering any of the suggested housing sites within Kilbarchan is covered in Issue 32.

Delivery of the Spatial Strategy

Paisley West & Central Community Council (345)

The LDP is a land use plan which provides direction for development and investment. The LDP Action Programme (CD/01) outlines how other organisations, bodies, individuals, etc may lead or support delivery of some of the aims within the Plan. It is considered that the LDP Action Programme (DC/01) is a positive addition to the development planning process which will evolve and require to be updated as various funding streams and initiatives come forward or change. It is considered that it will be a good tool for delivery.

Reporter's conclusions:

Implementing the spatial strategy

1. The proposed plan first sets out an overall spatial strategy and then five themes for delivery. The aim of the spatial strategy is to promote sustainable economic growth and the focus is on the development of previously used sites, concentrating on built up areas and key redevelopment sites.
2. The shaded box on page 6 of the proposed plan is headed 'Implementing the Spatial Strategy'. It includes an overarching policy in support of new development which meets certain criteria. The third criterion includes that the design of new development is appropriate for the area in terms of appearance, height, scale, massing and use of materials. The text also refers to Designing Places, which, along with Designing Streets sets out the Scottish Government's policy for design and making places. Designing Places includes that the development plan must set out the council's policies on design and the physical form of development. It adds that saying that the council is committed to good design, or that development should respect its context, is not enough. Much of the detailed information and guidance for Renfrewshire will be set out within the council's supplementary guidance. However, the spatial strategy of the proposed plan is the place to set out the overarching policy on good design and place making.
3. I agree with the MEPC representation that expecting buildings to be appropriate to the area in terms of appearance, height, scale and massing could stifle innovative design. The planning process should support as a priority the quality of architecture and place. In my view these can be improved by encouraging the right approach to design rather than setting a few basic criteria. Designing Places sets out the six qualities at the heart of good design. It also advocates a framework for design and supports the use of development briefs, master plans and design guides. By doing this it provides a thorough guide to improving the quality of spaces through planning. That encourages the right approach to design. I therefore recommend that the criteria in the shaded box on page 6 of the proposed plan be modified by removal of the reference to appearance, height, scale and massing and by strengthening the reference to Designing Places. This is best achieved by removing the existing second and third bullet points and replacing them with a reference to Designing Places.

Economic strategy

4. The economic strategy is covered further by my conclusions and recommendations under issue 2.

5. The aim of the proposed plan is to promote sustainable economic growth with a focus on the development of previously used sites. This would be implemented by planning permissions in accordance with the spatial diagram and proposals maps. In this way, the proposed plan encourages new development in the right place, which should then contribute to sustainable economic growth. The criteria for new development set out in the shaded box on page 6 of the proposed plan are general and would apply to all proposals. They promote good design and safe access; support low carbon generating technology; and seek to protect built heritage and the natural environment. These matters could be overlooked if not included in this overarching policy, but as sustainable economic growth is already set out as key to the strategy, an additional criteria requiring development to contribute positively to the economy or regeneration is not needed.

6. The economy is a key theme of the proposed plan and the spatial strategy has the aim of promoting sustainable economic growth by indicating opportunities for change and supporting investment. The economic investment locations in the economy section of the proposed plan and on the proposals maps show this. The proposed plan shows the locations for growth. This indicates a positive policy environment. The proposed plan need not include business support beyond this. Delivery is set out in the LDP action programme, which is the council's document for taking forward the proposed plan (and which is not being examined here).

7. The proposed plan supports redevelopment of small sites by its commitment to the vitality and viability of existing centres, protection and re-use of built heritage and its housing action programme policy. Small sites would contribute to the local economy and could help reduce the need for new greenfield sites. They might also encourage more house builders and thereby increase delivery of housing. The spatial strategy focuses on brownfield sites, which will protect many of the valuable assets and resources in Renfrewshire, but also encourages small developments on infill and redevelopment sites. There is already ample support for small sites and thus no need to modify the plan on this matter.

Places strategy

8. We have dealt with the use of green belt land for development under issues 17, 18 and 42. We have dealt with housing sites at Kilbarchan under issue 32.

9. House building is recognised as a key part of the national economy. It also provides some local employment. The Places section of the proposed plan recognises that house building is seen as a method to kick-start the economy. The supply of land for housing is dealt with under issue 17 of this report whilst the need for sustainable economic growth is the aim of the spatial strategy. Thus there is no need to include a reference to the economic benefits of house building in the spatial strategy.

10. The spatial strategy sets out the focus on the development of previously used sites, which helps to protect valuable assets of the rural area. This accords with the requirement in SPP to promote regeneration and the re-use of previously developed land. It reflects the importance of the planning system in supporting sustainable development. At the same time, the proposed plan recognises the need to develop some greenfield sites. I consider that the balance implied in the spatial strategy is appropriate. There is no need to include further comment on page 6 of the proposed plan.

11. I have found under issue 17 that the proposed plan does not identify sufficient land on a range of housing sites. Further sites will therefore need to be identified by a review of housing land supply. The spatial strategy implications of allocating further land will need to be considered in that review.

Reporter's recommendations:

That the second and third criteria in the shaded box on page 6 of the proposed plan be replaced by:

- The design of new development is demonstrated to benefit the area by following the principles of 'Designing Places'.

Issue 2	Economic Strategy, Policy E1 - Renfrewshire's Economic Investment Locations and Figure 6	
Development plan reference:	Economy Section text (page 8), Policy E1 and REIL's as shown on the Proposals Maps and Figure 6 - Renfrewshire's Economic Investment Locations	Reporter: Dannie Onn
Body or person(s) submitting a representation raising the issue (including reference number):		
MEPC (2081) The Royal Society for the Protection of Birds Scotland (RSPB) (183)		
Provision of the development plan to which the issue relates:	Policy to promote and support Renfrewshire's Economic Investment Locations which include Hillington Park, land at Burnbrae and Phoenix, Linwood.	
Planning authority's summary of the representation(s):		
<u>General Strategy</u> <u>RSPB (183)</u> Welcome the LDP objective in delivering the economic strategy to enhance the natural and built environment of Renfrewshire and the wide-ranging benefits this can lead to. <u>MEPC (2081)</u> Generally supportive of the emerging policy framework but feel the LDP could do more to ensure that it is fully aligned with the national priority of stimulating economic growth. MEPC generally supports the spatial strategy and how this strategy will be implemented by the proposed plan. It does consider, however, that the importance of Hillington Park is currently underplayed. There is an opportunity to raise the profile of the park as part of the strong network of Strategic Economic Investment Location's (SEILs) and Economic Investment Locations (EILs). Greater flexibility in the permitted uses is also needed in the economic policies to ensure that innovative and bespoke new growth and inward investment opportunities can be attracted. <u>Policy E1</u> <u>MEPC (2081)</u> Generally supports the draft Policy E1, however, a greater degree of flexibility should be provided in this policy, with the effect that other uses are not excluded if they complement the objective of sustained economic growth. It is noted that the Supplementary Guidance (SG) (CD/09) is supportive of ancillary uses where they support the function of EILs, nevertheless, a more flexible policy framework will help to ensure that the focus is on economic growth opportunities and employment generation rather than rigid use classes. It may also be effective for the LDP, as well as its Action Programme (CD/01), to promote		

private and public sector landowners to work together towards simplifying planning and removing barriers to the delivery of economic growth. Simplified Planning Zones (SPZs) are a tool that could be employed to great effect at Hillington Park.

Land at Burnbrae and Phoenix, Linwood

RSPB (183)

This site has considerable biodiversity value and has historically been used by species connected to the Black Cart Special Protection Area.

LDP Economy Section Text

MEPC (2081)

The LDP needs to clarify the difference between the EILs and the three SEILs so it is consistent with the Proposed Supplementary Guidance (CD/09). Additional text should be added to the LDP to recognise that infrastructure improvements can assist in promoting economic development in REIL's.

Figure 6

MEPC (2081)

Figure 6 is underplaying the importance of Hillington Park and the limited text about the park is disappointing. There is an opportunity to better capture the current scale of the park in terms of accommodation and jobs and its significant support facilities. MEPC welcomes the recognition of its ongoing investment at Hillington Park but considers that recognition should also be made of the potential for clustering where opportunities to provide a wide range of premises and improved business support services which will assist in achieving a sustainable business neighbourhood.

Modifications sought by those submitting representations:

Add the following text to Policy E1:

Other uses that complement the objective of sustainable economic growth will also be supported.

The Council will seek to simplify planning control in these locations. (2081)

The classification of the land at Burnbrae and Phoenix, Linwood as an Economic Investment Location should be removed and be re-classified as a Site of Importance for Nature Conservation. (183)

Add the following text to the end of the first paragraph of the REIL's section, Pg 8, Proposed LDP.

Opportunities to improve existing key infrastructure will be supported. (2081)

The LDP should be amended with the addition of a new paragraph to clarify the difference between the EIL's and the three SEIL's so it is consistent with the Proposed New Development SG (CD/09). (2081)

Add the following text to Figure 6 under the heading Role and Function for Hillington:

currently providing 185,000m2 of employment floorspace and other support facilities and employing approximately 3,000 people.

and under the heading Challenges/Opportunities add:

The park provides a range of opportunities to provide premises at differing scales and for a wide range of businesses, and to achieve clustering of uses. Ancillary facilities will assist in achieving a sustainable business neighbourhood. (2081)

Figure 6 should be amended to clarify which of the EILs are strategic EILs, to ensure consistency with the Proposed New Development Supplementary Guidance (CD/09). (2081)

Summary of responses (including reasons) by planning authority:

General Strategy

RSPB (183), MEPC (2081)

The Council welcomes the support.

Policy E1(2081)

The council recognises the importance of Hillington Park to the Renfrewshire economy and future economic growth. This was reflected in the area being identified as a Strategic Economic Investment Locations (SEIL) in the Glasgow and the Clyde Valley Strategic Development Plan (GCVSDP) (CD/02). The GCVSDP (CD/02) details the role and function of SEIL's which comprise the city-regions strategic response to long-term sustainable economic growth. The proposed Local Development Plan (LDP) through Policy E1 and the New Development Supplementary Guidance (SG) (CD/09) will support and promote sustainable economic growth within these areas and the other Economic Investment Locations (EIL) throughout Renfrewshire. Industrial and business type uses typically found within Classes 4, 5 and 6 will be promoted within these areas, however, the detailed criteria within the New Development SG (CD/09) does allow flexibility. As detailed within the LDP Action Programme (CD/01) the Council will develop and continuously review the Economic Strategy and associated action plans to support economic activity, investment and employment opportunities within Renfrewshire. The feasibility of Simplified Planning Zones will be investigated as part of continuous review process through the LDP Action Programme (CD/01). It is considered that Policy E1 will provide sufficient flexibility in delivering sustainable economic growth and the proposed modifications to this policy are not considered necessary.

Land at Burnbrae and Phoenix, Linwood (183)

This land forms part of the Glasgow Airport SEIL which was identified in the Glasgow and Clyde Valley Strategic Development Plan (CD/02). The proposed LDP reflects what was in this plan and it is considered that this area will make an important contribution to sustainable economic growth within Renfrewshire. The Habitats Regulations Appraisal (CD/10) prepared alongside the proposed LDP concluded that the proposals for this site alone or in combination would have no adverse effects upon the integrity of any Natura 2000 sites. Furthermore, Scottish Natural Heritage raised no concerns regarding this site. Planning consent has been granted for a mixed use development including classes 4, 5 and 6 (CD/11) on land to the north east of Phoenix within the SEIL as identified on Proposals Map E. The suggested modification is therefore rejected and the current land

use zoning will remain.

LDP Economy Section Text (2081)

If the reporter was so minded it is proposed that the following text is added to the end of the first paragraph of the Renfrewshire Economic Infrastructure Location's (REIL) section, Pg 8, proposed LDP:

Opportunities to improve existing key infrastructure will be supported where appropriate.

It is agreed that additional text is required to recognise that infrastructure improvements can assist in promoting economic development in REIL's.

The council would suggest that this representation does not recognise the relationship between the proposed LDP and the New Development SG (CD/09) as both documents need to be read together. While Policy E1 does not identify the specific SEIL's and Local Industrial Area's which together make-up REIL's, this distinction is clearly made both within the Proposal's Maps and the New Development SG (CD/09). Furthermore, the role and function of each SEIL is clearly defined within the GCVSDP (CD/02). It is not considered necessary to add a paragraph to the proposed LDP or amend Figure 6.

Figure 6 (2081)

If the reporter was so minded it is proposed that the following modifications are made to Figure 6 to recognise the role of Hillington Park and the opportunities available. Under the heading Role and Function for Hillington change the text to read:

Key strategic business park adjacent to M8.

and under the heading Challenges/Opportunities for Hillington add:

The park provides a range of opportunities to provide premises at differing scales and for a wide range of businesses.

We agree that this provides a more accurate description of Hillington. The other parts of the suggested additional text are considered to be too detailed for the purposes of this figure, furthermore, the floorspace and employment numbers are likely to change during the plan period.

Reporter's conclusions:

Hillington Park

1. This is a key strategic business park alongside (and with good access to) the M8 motorway. It is a strategic economic investment location (SEIL) identified in the Glasgow and Clyde Valley Strategic Development Plan (SDP). I agree with the council, in response to representations, that the wording at figure 6 should be improved to recognise the role of the business park and the opportunities available. I also agree that the text at page 8 should be improved to recognise that infrastructure improvements can assist in promoting economic development in all of the designated economic investment locations in Renfrewshire.

2. Policy E1 of the proposed plan would support business, general industry and storage

and distribution uses (Classes 4, 5 and 6 of the Town and Country Planning (Use Classes) (Scotland) Order 1997). Allowing those uses helps to promote sustainable economic growth. There is nothing which suggests a flexible approach to innovative and bespoke opportunities for investment. However, proposed policy E1 includes that ancillary service provision will be supported as well as the main uses.

3. The proposed use classes cover a broad range of employment opportunities, compatible with the identified role and function of the SEIL. To support any other employment generating use or other development which might contribute to sustainable economic growth could open the way to a number of uses planned for, or more suited to, other locations. That could undermine the spatial strategy of the proposed plan and the role and function of Hillington Park. I consider that the general acceptability of ancillary uses, plus the general requirement, when determining proposals in accordance with the development plan, to have regard to material considerations, would provide sufficient flexibility to develop the level of support and amenity required for an integrated employment community. I also consider that nothing in the policies would preclude clustering of related businesses. There is thus sufficient support for and flexibility in employment uses that I see no need to seek to simplify planning control in the economic investment locations, although this is something that the council and landowners can work towards independently of the local development plan. No modification to the text is needed.

4. On page 8 under the heading Renfrewshire's Economic Investment Locations, the proposed plan sets out the support for strategic locations identified in the Glasgow and Clyde Valley Strategic Development Plan as well as other locally important areas. These are then shown diagrammatically at figure 5 and scheduled at figure 6 of the proposed plan. They are also clearly shown on the proposals maps, where local areas are distinguished by a dashed red line. These areas are all supported for development of business, industry, storage and distribution uses. There is no need to distinguish between them in the policy text. The supplementary guidance is not being examined here. In accordance with the Town and Country Planning (Development Planning) (Scotland) Regulations 2010, the information and detail in the supplementary guidance should only relate to the policies and proposals in the plan and with an expressly stated link to them. Nevertheless, any distinction made for local economic investment location (EIL) would simply provide detailed policy where the main principles are already established and thereby accord with the guidance of circular 06/2013. I therefore see no reason to modify the proposed plan by referring to them separately in the text.

Land at Burnbrae and Phoenix

5. This land is part of the area allocated in the SDP for strategic economic investment in connection with the airport zone. RSPB says that this site has considerable biodiversity interest and has historically been used by species connected to the Black Cart special protection area (SPA). However, the Habitats Regulations Appraisal carried out for the proposed plan found that there would be no adverse effect on the SPA and Scottish Natural Heritage has raised no concerns relating to this land. Furthermore, policy E1 as proposed welcomes development which does not have an adverse effect on the integrity of any Natura 2000 sites. This provides additional protection. I see no reason to remove the allocation. No modification is required to the proposed plan in this matter.

Reporter's recommendations:

That the proposed plan be modified as follows

1. Add to the end of the first paragraph of the Renfrewshire Economic Infrastructure Location's section on Pg 8: *Opportunities to improve existing key infrastructure will be supported where appropriate.*
2. Under the heading Role and Function for Hillington change the text to read: *Key strategic business park adjacent to M8.*
3. Under the heading Challenges/Opportunities for Hillington add: *The park provides a range of opportunities to provide premises at differing scales and for a wide range of businesses.*

Issue 3	Policy E2 – Glasgow Airport Zone and Figure 5 – Renfrewshire’s Economic Investment Locations	
Development plan reference:	Policy E2 Glasgow Airport Zone as shown on Figure 7 and Figure 5 – Renfrewshire’s Economic Investment Locations	Reporter: Dannie Onn
Body or person(s) submitting a representation raising the issue (including reference number):		
MEPC (2081)		
Provision of the development plan to which the issue relates:	Policy to promote the area around Glasgow Airport as a key location which will support economic growth and the requirements of the airport.	
Planning authority’s summary of the representation(s):		
<u>MEPC (2081)</u> It is noted that Figure 5 (Renfrewshire’s Economic Investment Locations) identifies Hillington Park as falling outside the defined Glasgow Airport Zone. By contrast, Policy E2 (Glasgow Airport Zone) includes Hillington, alongside Inchinnan Business Park, Westway and Linwood as key locations for economic growth including the operational requirements of the international airport. MEPC recognises the scope for increased synergy with the airport economy, considering its proximity and excellent connectivity, and therefore would support the revision of Figure 5 to include Hillington Park within the Airport Zone. This amendment would demonstrate that the council recognises and understands the park’s existing and potential relationships with the local economy.		
Modifications sought by those submitting representations:		
Amend Figure 5 to extend the Glasgow Airport Zone to include “Hillington Park”. (2081)		
Summary of responses (including reasons) by planning authority:		
<u>MEPC (2081)</u> Glasgow Airport Investment Zone covers a broad area which groups the airport and three significant industrial areas (Inchinnan Business Park, Westway and Linwood Phoenix) which together form the Glasgow Airport Strategic Economic Investment Location (SEIL). This SEIL together with the other two within Renfrewshire (Renfrew North and Hillington SEIL and Bishopton SEIL) were identified in the Glasgow and the Clyde Valley Strategic Development Plan 2012 (GCVSDP) (CD/02). The Renfrewshire Local Development Plan (LDP) reflects the GCVSDP (CD/02). The council recognises the importance of Hillington Park to the Renfrewshire economy and future economic growth; this was reflected in the area being		

identified as a SEIL. While it is agreed that there is scope for increased synergy with the airport economy, Hillington Park does not form part of the Glasgow Airport Investment Zone. The reference to Renfrew North and Hillington SEIL was added to Policy E2 in the proposed LDP in error. If the reporter is so minded, all reference to Renfrew North and Hillington SEIL should be deleted from Policy E2 so as to reflect the GCVSDP (CD/02).

Reporter's conclusions:

1. The Glasgow and Clyde Valley Strategic Development Plan (the SDP) identifies Strategic Economic Investment Locations (SEILs) as part of its spatial development strategy. These are based on their ability to offer specific roles and functions to support a rebalanced low carbon economy. The SDP expects the proposed plan to safeguard the locations of SEILs and the role, function and uses defined in the SDP. The strategic economic areas are set at a strategic level. The proposed plan recognises this, but should not seek to change it.
2. The SDP recognises that the airport's longer-term development depends in part on economic activity delivered through the SEILs located around the airport. It defines the airport zone SEIL as three sites: Inchinnan, Linwood and Westway.
3. The proposed plan maps the Glasgow Airport Zone at figure 7 and diagrammatically at figure 5. It encloses the three SEILs at Inchinnan, Westway and Phoenix (at Linwood) – broadly as identified in the SDP.
4. At policy E1, the proposed plan seeks to promote and guide significant investment opportunities to the SEILs and strategic centres identified in the SDP. It then separates out the defined airport zone, where a forum is established to assess synergies and potential for joint working and to establish a masterplan for the zone and wider connections.
5. The promotion of this zone is subject to policy E2 of the proposed plan. As currently drafted this lists the business parks and includes Hillington / Renfrew North. This, however, would be inappropriate in a policy which is intended to incorporate the strategic areas as they are defined by the SDP. Policy E2 of the proposed plan should therefore be modified to reflect the SDP by removing all reference to Renfrew North and Hillington SEIL. At the same time, figure 5 (and other maps) should not be amended to include Hillington Park.
6. I accept that this arrangement does not prevent Hillington from contributing to the airport economy. It is within easy reach of it along the M8 motorway. Connections might usefully be considered in the masterplanning of the airport zone. However, I am not persuaded that any further support for Hillington should be provided by including it in the zone itself.

Reporter's recommendations:

That policy E2 of the proposed plan be modified by removing the words *Hillington / Renfrew North* after *Linwood* and by adding the word *and* before *Linwood*.

Issue 4	Policy E3 – Transition Areas and Figure 9	
Development plan reference:	Policy E3 – Transition Areas as shown on Proposals Map and Figure 9: Renfrewshire LDP Transition Areas	Reporter: Ron Jackson
Body or person(s) submitting a representation raising the issue (including reference number):		
Decathlon (UK) Ltd (61) Scottish Water (154) Glasgow City Council (204) Cosmopolitan Hotels (457) Christie & Sons (Metal Merchants) Ltd (2050) Mrs Pamela Sloan (2063) Clydeport Operations Ltd (2066) Braehead Property Ltd (2078)		
Provision of the development plan to which the issue relates:	Policy to support a mix of compatible uses in areas where change is anticipated and encouraged and a specific land use zoning is not appropriate. Policy E3 – Transition Areas. 12 Transitions Areas identified in Figure 9 of LDP, representations refer to: Erskine Riverfront; Meadowside Street/Blythswood Area/Normandy Hotel, Renfrew; Old Govan Road, Braehead; Paisley North/ Abercorn Street/ Renfrew Road, Paisley; and, Middleton Road, Linwood.	
Planning authority's summary of the representation(s):		
<u>Policy E3 General</u> <u>Glasgow City Council (204)</u> The proposal to introduce Transition Areas in industrial and business areas, and locations which contributed to the industrial and business land supply, appears to be a sensible approach in the context of reduced demand for these types of employment uses. <u>Meadowside Street/Blythswood Area/Normandy Hotel Transition Area</u> <u>Clydeport Operations Ltd (2066)</u> Policy E3 is welcomed and supported as it applies to Meadowside Street/ Blythswood Area/ Normandy Hotel Transition Area. The flexibility will help maximise the potential for development, especially given the prevailing economic circumstances and market conditions. It will continue the waterfront regeneration efforts in the area and provide benefits to both the local and wider area which will allow the transformation of an under-utilised brownfield site and bring it back into an active and beneficial use.		

Cosmopolitan Hotels (457)

Support the new policy designation as Policy E3 Transition Area which gives flexibility for ongoing and future development use on the Normandy Hotel site.

Scottish Water (154) – (Land at Lodge Road, Renfrew, Ref 5057)

Welcome the allocation of the Transition Area on the basis that it can be brought forward to deliver housing land. However, the policy is deficient as it gives rise to the potential for piecemeal development.

Christie & Sons (Metal Merchants) Ltd (2050)

Concerned that the LDP has identified land in Christie & Sons ownership within this Transition Area. Concerned at the inference within Policy E3 that such areas are likely to change within the lifetime of the plan to something different. There is a need to keep a spread of employment areas across Renfrewshire, and to identify areas for the type of waste processing uses being undertaken at Lobnitz Dock. Requested that this area is identified as a Policy E1 site. This would reflect the area's current and likely future use for the life of the plan.

Mrs Pamela Sloan (2063)

Concerns raised about this Transition Area as the land supports a variety of wildlife. It includes a Site of Importance for Nature Conservation and is covered with a Tree Preservation Order. The Council have failed to maintain, develop and enhance it. Priority needs to be the protection of flora, fauna and the environment as well as protecting, enhancing and maintaining the core walkway for the community in Renfrew. New developments would have an extremely negative effect on an already fragile flora and fauna interest.

Erskine Riverfront Transition Area

Cosmopolitan Hotels (457)

Support the new policy designation as Policy E3 Transition Area which gives flexibility for ongoing and future development use on the Erskine Bridge Hotel site.

Middleton Road, Linwood Transition Area

Scottish Water (154)

Support the identification of Middleton Road, Linwood, including the Scottish Water site, as a Transition Area and also support the associated policy.

Old Govan Road, Braehead Transition Area

Braehead Property Ltd (2078) – (Howden Site, Renfrew Ref 2194)

The subject site should not be identified as a Transition Area and should comprise an

integral part of the C1(STC) – Strategic Town Centre designation (see representation 2078 to Issue 8). The western boundary of the site designation is totally arbitrary. It is inappropriate to exclude retail uses from the site-specific E3 – Transition Area designation (figure 9). The reference to retail uses not being considered acceptable in this location is not justified. A mixed use proposal incorporating retail use would be more appropriate and more capable of co-existing with the existing uses and character of the area than the existing industrial use. The development of the subject site for town centre type uses could relate equally as well to the proposed new public transport interchange than the proposals currently submitted to redevelop the existing shopping mall to the north. An initial analysis of the potential scale of retail development that could be accommodated on the subject site has been provided.

Decathlon (UK) Ltd (61) – (Land to South of Old Govan Road, Renfrew Ref 5005)

Retail uses should not be specifically precluded in this Transition Area but should be considered against other policies in the LDP such as criteria-based retail policies. No reason has been given in the LDP as to why retail uses are not acceptable in all circumstances. It is unreasonably restrictive, not justified and prevents appropriate opportunities from coming forward that would help achieve transition, regeneration and beneficial economic development.

Modifications sought by those submitting representations:

No modifications suggested (2066, 204, 457, 2063)

In Figure 9 under the heading “Opportunities” for Meadowside Street/Blythswood Area/Normandy Hotel, Renfrew Transition Area revise the wording to read:- A flexible approach to development in this area to deliver regeneration of the older industrial area and failing retail park. Opportunity to improve public realm and strengthen residential offer in this area, improve links with the neighbouring residential areas and deliver Renfrew Northern Distributor Road to improve traffic flows within Renfrew Town Centre. The wider site offers an opportunity to seek a comprehensive solution to the regeneration of the area and piecemeal development should therefore be avoided. Any proposal to redevelop the site should be accompanied by a detailed assessment of the impact on the existing woodland together with outlining mitigation measures where appropriate. (154)

The Meadowside Street and Blythswood Area should be zoned for Policy E1 rather than Policy E3. (2050)

The preferred option is for the area identified as the Old Govan Road, Transition Area to be re-zoned and included within Braehead Strategic Town Centre, Policy C1 (see representation 2078 to Issue 8). Should this modification be rejected it is proposed that Figure 9 should be modified to remove reference to “*retail uses would not be acceptable*” with regards to the Old Govan Road, Braehead Transition Area. (2078)

In Figure 9 under the heading “Acceptable uses” for Old Govan Road, Braehead Transition Area delete “Retail uses would not be acceptable” and replace with, “*Retail uses would be considered against other policies in the Plan*”. (61)

Summary of responses (including reasons) by planning authority:
<p><u>General Support (2066, 204, 457)</u></p> <p>Support for Policy E3 is noted and welcomed.</p> <p><u>Meadowside Street/Blythswood Area/Normandy Hotel Transition Area</u></p> <p><u>Scottish Water (154)</u></p> <p>The council does not agree that Policy E3 would give rise to the potential for piecemeal development. The New Development Supplementary Guidance (SG) (CD/09) prepared alongside the proposed LDP clearly promotes the comprehensive development of these areas aiming to avoid piecemeal development with the use of a masterplan or design brief approach (SG p5). Development briefs will encourage comprehensive redevelopment and will be prepared for each Transition Area as detailed in the LDP Action Programme (CD/01).</p> <p>The land at Lodge Road includes woodlands that are covered by a Tree Preservation Order and designated as a Site of Importance for Nature Conservation. Any development proposal would be required to take account of these designations and would be considered in relation to Policy ENV 2 and the relevant guidance in the New Development SG (CD/09). The proposed modifications to Figure 9 are rejected as they are not considered necessary.</p> <p><u>Christie & Sons (Metal Merchants) Ltd (2050)</u></p> <p>With the emergence of the new community in the Renfrew North area and the opportunity to deliver the Renfrew Northern Distributor Road through this transition area, the council views this land as having potential to accommodate a mix of uses. As set out in Policy E3 new development proposals must be capable of co-existing with existing uses. As suggested in the schedule for Issue 15 Policy I8, in response to the representations made by SEPA, waste management uses are acceptable within Policy E3 areas. There is therefore no reason why the objector's use cannot be maintained during the lifetime of the plan while other parts of the Transition Area change around it. Should circumstances change however, then the Policy allows more flexibility than Policy E1 would allow.</p> <p><u>Mrs Pamela Sloan (2063)</u></p> <p>Meadowside Street/Blythswood Area/Normandy Hotel, Renfrew Transition Area has a range of land uses some of which add and others detract from the overall character and appearance of the area. It is agreed that parts of the site support important biodiversity, flora and fauna and the council see that as an asset and any development will be required to maintain and where appropriate enhance these assets in line with LDP policies and guidance. However there is a large amount of underutilised and redundant buildings, sites not fit for purpose and vacant land within this area which is considered to detract significantly from Renfrew. Through promoting Policy E3 the Council will prepare development briefs to guide comprehensive redevelopment ensuring protection of assets but allowing for a flexible approach and encouraging the right development to stimulate economic growth.</p> <p><u>Middleton Road, Linwood Transition Area (154)</u></p>

The response to the site at Middleton Road and support of Policy E3 is welcomed and supported.

Old Govan Road, Braehead Transition Area

Braehead Property Ltd (2078)

The suggested modifications to the proposed LDP, to include this area within Braehead Strategic Centre are rejected by the council (see representation 2078 to Issue 8). The boundary of the Transition Area was identified by considering where change is anticipated would be encouraged and could be supported largely focusing on vacant or underused land. The Transition Area does not extend to the boundary of the residential properties on Merlinford Crescent, as the council would want to see any future redevelopment of the test centre, technology centre and offices which are part of the existing Howden site to be more in keeping with the residential amenity of the neighbouring properties. The mix of acceptable uses would be far more restrictive on this part of the site and therefore a Policy P1 designation is considered to be more appropriate.

Old Govan Road, Braehead Transition Area – Retail Use (2078, 61)

This area sits at the edge of Braehead Strategic Town Centre (STC). A range of ‘acceptable uses’ have been identified in Figure 9 which the council is satisfied is sufficiently flexible to encourage the right types of development to help transform this area and the quality of the environment on approach to Braehead STC. Retail has not been identified as an acceptable use for this Transition Area as the council wishes to focus retail investment in the Network of Centres and in this location would direct retail development to Braehead STC. Should a proposal for a retail use come forward, as is the case with the recent planning application for a Decathlon store to the south side of Old Govan Road, the proposal will be assessed in relation to Policy C2 in the LDP as well as the New Development SG (CD/09) taking into account the edge of centre location. The council is minded to grant planning permission for the Decathlon store which shows there is a degree of flexibility in the application of Policy E3. However, given the location of this Transition Area the suggested modifications to Figure 9 are rejected as opening up the whole Transition Area to retail development could draw focus away from Braehead STC and impact on the vitality and viability of this centre.

Reporter’s conclusions:

General

1. The support expressed by Glasgow City Council, Clydeport Operations Ltd, Cosmopolitan Hotels and Scottish Water are not unresolved representations and do not require to be considered as part of the local plan examination.

Meadowside Street/Blythswood Area/Normandy Hotel Transition Area

2. The local plan makes clear that Transition Areas are areas where change is anticipated and encouraged. Figure 9 outlines potential uses for each of the Transition Areas. Guidance on developing within these areas is set out in the council’s New Development Supplementary Guidance (CD09). That guidance provides that

development proposals must meet a number of criteria, including giving consideration to comprehensive development of these areas and the avoidance of piecemeal development with the use of a masterplan or design brief approach. All proposals would also be considered in relation to the relevant development criteria within the guidance, for example, a proposal for a new residential development in a Transition Area would be considered against the Places Development Criteria as well as the criteria in the Infrastructure and Environment Section of the guidance. Developments must protect and where possible enhance Sites of Importance for Nature Conservation, such as the woodlands at Lodge Road, to ensure that their nature conservation interest is maintained. Development proposals would also require to take account of designations such as Tree Preservation Orders.

3. The council's guidance also provides that development should not adversely affect existing species, habitats and ecosystems and that adverse effects on species and habitats should be avoided with mitigatory measures and implementation strategies provided. Proposals would not be acceptable where they would have an adverse effect on protected species unless it can be justified in accordance with the relevant protected species legislation. In view of all of the foregoing, I am satisfied that adequate protections are in place to guard against piecemeal development and to protect the existing woodland and biodiversity interests where appropriate. Therefore there is no need to modify the wording of the opportunities applying to this Transition Area.

4. The council has confirmed in its response in Issue 15 that the New Development Supplementary Guidance is to be amended to provide that in relation to Transition Areas, proposals for waste management infrastructure will be acceptable where it conforms to, meets and delivers the objectives of the Zero Waste Plan, as well as demonstrating that it will not impact upon amenity or operation of other uses, subject to site specific considerations. The council has also confirmed that there is no reason why the existing waste management use in this Transition Area cannot continue during the life of the plan. Policy E3 allows more flexibility in considering waste management proposals than Policy E1, which requires such proposals to be assessed against the more restrictive Business and Industry Development Criteria contained in the council's guidance. In view of the foregoing, I am satisfied that Policy E3 is the appropriate designation for this waste management site. However, because of this existing use, I consider it appropriate to expand the range of acceptable uses shown in Figure 9 to include waste management. That would more accurately reflect the present position and the proposed change to the council's guidance.

5. Any proposal for retail development would require to be assessed against Policy C2. Such a proposal would require to be accompanied by clear justification as to why sites within the Network of Centres had been discounted and show no significant impact on the vitality and viability of that Network. Figure 9 also makes clear that any retail proposal would require to be of a scale appropriate to the Network of Centres. These provisions should ensure that any retail proposal within this Transition Area does not undermine existing centres.

Old Govan Road, Braehead Transition Area

6. The suggestion that this area be included within Braehead Strategic Town Centre (as it is called in the proposed plan) is addressed in Issue 8.

7. The north western part of the site owned by Braehead Properties is covered by policy

P1 – Renfrewshire’s places. This policy provides that within uncoloured areas on the proposals maps there will be a presumption in favour of the continuance of the built form. New development should be compatible and complementary to existing uses and demonstrate that they would cause no significant impact on these uses. Policy P1 does not prevent development and I agree with the council that development of this western part of the Howden site, which lies on the north side of Old Govan Road, would require to have regard to the residential amenity of the neighbouring properties. The P1 policy designation is appropriate therefore, for this part of the site.

8. Most of the remainder of the site is covered by policy E3 – Transition Areas. The council has stated that any proposal for retail use in the Transition Area would be assessed against Policy C2 and the New Development Supplementary Guidance (CD09). The council is minded to grant planning permission for a store on the south side of Old Govan Road. That shows a measure of flexibility in the application of Policy E3. I appreciate the council’s wish to focus retail investment in the Network of Centres, including the adjoining Braehead Strategic Centre. However, in my opinion, granting planning permission for retail development on the south side of Old Govan Road would also undermine the council’s position that retail uses in this area would not be acceptable.

9. Policy C2 requires that a sequential approach to site selection has been adopted. This Transition Area is on the edge of Braehead Strategic Centre. The application of a sequential approach to any retail proposal in this Area would require applicants to demonstrate that more central options had been thoroughly assessed and that the impact on existing centres was acceptable. That requirement provides a considerable safeguard against uncontrolled retail development. In view of that, and for the reasons set out in the preceding paragraph, I conclude that a blanket prohibition on retail development in this Transition Area would be inappropriate.

Reporter’s recommendations:

I recommend that the following modifications be made:

1. Add the words “waste management” between the words “business” and “and” in the column headed “Acceptable uses within Transition Area” in relation to Meadowside Street/Blythswood Area/Normandy Hotel, Renfrew on page 13 of the plan.
2. Delete the words “(retail uses would not be acceptable)” in the column headed “Acceptable uses within Transition Area” in relation to Old Glasgow Road, Braehead on page 13 of the plan.

Issue 5	Alternative Renfrewshire Economic Investment Locations (REIL's)	
Development plan reference:	None	Reporter: Ron Jackson
Body or person(s) submitting a representation raising the issue (including reference number):		
James Ritchie (64) J & H Ritchie Ltd (2090) Rossford Ltd (2097)		
Provision of the development plan to which the issue relates:	Alternative suggested Renfrewshire Economic Investment Locations (REIL's) at Arkleston Farm, Paisley.	
Planning authority's summary of the representation(s):		
<u>Arkleston Farm, Paisley (Site Reference – 5039)</u> <u>James Ritchie (64)</u> This site should be identified within the Local Development Plan for industrial uses. The site is deliverable which is important in the current economic situation. The representations made to Renfrewshire's Main Issues Report (CD/05) regarding the suitability of this site are unchanged. This representation identified that the LDP provides an opportunity to facilitate an extension to the Hillington Industrial Estate, which will in turn attract more businesses to the area, safeguard the estate and allow the Industrial Estate to evolve and prosper. With Hillington Industrial Estate playing such an important role in Paisley and Glasgow's industrial landscape, it should be allowed to grow through the allocation/zoning of additional land identified at Arkleston Farm.		
<u>Land at Arkleston Farm, Paisley (Site Reference – 5040)</u> <u>Rossford Ltd (2097)</u> This site should be identified within the LDP for office and motorway services uses. The representations made to Renfrewshire's Main Issues Report (CD/05) regarding the suitability of this site are unchanged. This representation identified that there is significant scope for an office development at the proposed location. The site is accessible, next to the M8, within close proximity of the airport and a contemporary development at this Gateway location (between the International Airport in Renfrewshire and Glasgow city centre) would further improve the perception of the area. There are also few business parks in the area and few vacant sites in Paisley that would be of an adequate size to accommodate a business park. A business park at this location would assist in the economic regeneration of the area and attract inward investment. It would also appear to be more logical to have a business park on the edge of a settlement, reducing traffic congestion.		

J & H Ritchie Ltd (2090)

Of interest in the proposed Local Development Plan (LDP) are the sites in Schedule 2 where the Plan proposes that "should development not occur within the lifetime of this Plan the sites will revert back to green belt designation". This approach should be applied to the full range of development types as it allows a win- win situation in that given the economic situation. Should any alleged development ready sites not deliver then it does not continue to disadvantage more appropriate sites beyond the lifespan of the Plan. The area of land at Arkleston Farm should be included in the LDP even with a "develop or lose it status".

Modifications sought by those submitting representations:

No modifications suggested (64, 2097)

The area of land at Arkleston Farm should be included in the LDP even with a "develop or lose it status". (2090)

Summary of responses (including reasons) by planning authority:

Green belt Issues (64, 2090, 2097)

The sites identified at Arkleston Farm are on an important and sensitive wedge of green belt between Paisley and Glasgow which is already limited in extent. Any further incursions into the green belt in this area would result in coalescence between Paisley and Renfrew or Hillington Industrial Estate and further south with Glasgow. These sites provide an attractive green and open landscape buffer which is a significant contrast to the industrial area of Hillington and the residential area of Gallowhill, which the area of green belt both visually and physically separates. The fields themselves provide a positive contribution to the landscape character of the area and are an attractive gateway feature, development would therefore have a significant impact on the area.

Supply of Industrial and Office Land (64, 2097)

Renfrewshire has a considerable supply of land for industrial and office uses with 140.3 hectares of marketable land identified in the 'Industrial and Business Survey' Background Paper 7 (CD/12) to the proposed LDP. This supply provides a diverse range and choice of sites which will meet the land supply needs for industrial and business developments for at least the LDP period. A notable feature of the last few years has been a lack of land take-up for industrial and office uses. The proposed LDP focuses on promoting and delivering brownfield development opportunities within the identified Renfrewshire Economic Investment Location's (REIL) rather than adding an area of sensitive green belt to the already considerable supply of land.

Arkleston Farm, Paisley (Site 5039) (64)

Hillington Industrial Estate is a key strategic location which will contribute to economic and employment growth within Renfrewshire. This was recognised in the identification of the Hillington and Renfrew North area as a Strategic Economic Investment Location (SEIL) within the Glasgow and Clyde Valley Strategic Development Plan (2012) (CD/02). This SEIL currently has 28.4 hectares of land available for industrial and office

developments. The proposed LDP promotes and supports economic growth within this SEIL and key to achieving this will be the development of existing sites within the area. An expansion is not required given the amount of available land and redevelopment opportunities that currently exist within the SEIL. Rather than allowing Hillington Industrial Estate to evolve and prosper, this proposal could impact on the success of this location and impinge on the delivery of existing development sites. The suggested change to the land use zoning of this site is not accepted.

Land at Arklestone Farm, Paisley (Site 5040)

Rossford Ltd (2097)

While it is agreed that this site is well located in terms of accessibility to the M8 Motorway and Glasgow Airport it is not considered to be suitable for office or motorway service developments. In terms of office developments the council's response is the same as the above comments on land supply and in relation to site 5039 in terms of need and impact on existing REIL's. There is a sufficient supply of land and vacant premises within Renfrewshire to meet the demand for office developments. A number of opportunities currently exist for office developments including Hillington frontage and Paisley Strategic Town Centre (STC) as well as building on the success of recent office developments around Glasgow Airport and Braehead STC. In terms of motorway services it is considered that a sufficient need or demand for such a use in this location has not been demonstrated to justify the development of this sensitive area of green belt land. Furthermore, existing services are available at Junction 26 including a restaurant and a "drive thru" coffee shop. The council would also question the availability and deliverability of this site, as it would have to be demonstrated that suitable access and egress could be provided to the trunk road network which would involve significant investigative works and implementation costs.

J & H Ritchie Ltd (2090)

The approach identified in Proposal P3 within the proposed LDP is specific to the additional housing sites that have been identified in the green belt. With regards to land zoned for industrial and business uses the council reviews its land supply each year through the Industrial and Business Land Survey (CD/12). This ongoing review resulted in 69.6 hectares of land being removed from the industrial and business marketable land supply, with a considerable amount of this land now being within Transition Areas (Policy E3) in the proposed LDP. The approach adopted in relation to additional residential sites identified in the green belt is not considered to be appropriate in relation to all uses in the proposed LDP, the ongoing review of the LDP as identified in the LDP Action Programme (CD/01) will be sufficient. Furthermore, the land at Arklestone Farm is not considered to be suitable for development regardless of a "develop it or lose it approach".

Reporter's conclusions:

Arklestone Farm, Paisley (Site Reference – 5039)

1. Hillington Industrial Estate lies to the east of this site. It is identified as a Strategic Economic Investment Location (SEIL) in the structure plan. A SEIL is defined in the structure plan as a sustainable location within the Spatial Development Strategy, specifically identified because of its ability to meet the role and function needed to foster investment and development in key economic sectors. The structure plan requires the

local development plan to put in place measures to safeguard such locations and to ensure their ability to respond to their defined role and function. One of the key objectives of the local development plan therefore is to promote and guide significant investment opportunities to such strategically important locations. This SEIL currently has 28.4 hectares of land available for industrial and office developments. It is not in dispute that there is sufficient land available in Renfrewshire for industrial and business use for at least the period of the plan. I have seen no evidence to suggest that there is a need for the release of green belt land to accommodate unmet demand for industrial and business use in this area. In any event I agree with the council's landscape assessment in CD06 that the site is prominently located and part of an area that prevents the further coalescence of Paisley and Glasgow. Development of the site would have a negative impact on the character and setting of the settlements and greenbelt. Therefore it is not suitable for development.

Arkleston Farm, Paisley (Site Reference – 5040)

2. This site appears to be well located in terms of accessibility, lying immediately to the south of the M8 Motorway. However, for the reasons set out in the previous paragraph, I find no justification for development of the site for business use. I also agree with the council's landscape assessment shown in CD06 that the site is part of the wider character of open undulating arable field network that prevents the coalescence of Paisley and Glasgow along the M8. This open undulating arable field pattern also creates an attractive setting for the settlements. In view of this, and in the absence of a compelling case for such development, I am not persuaded that the site should be identified for motorway services use.

General

3. The council's Industry and Business Survey (CD12) monitors the land supply for industrial and business uses, provides details of the take up of land for these uses and the development of land for industry and business in Renfrewshire. This survey is carried out every year and as a result of this comprehensive review of Renfrewshire's marketable land, land is added to and removed from the marketable supply as appropriate. While I note the concern that a lack of delivery of development ready sites might disadvantage more appropriate sites, the above comprehensive review adequately addresses such concerns. For the reasons set out therein, it is recommended in Issue 18 that the provision in Proposal P3 that undeveloped greenfield land should revert back to green belt be removed from the plan. The same principles apply here. In any event for the reasons set out above, Arkelston is not a more appropriate development site than those identified in the plan.

Reporter's recommendations:

No modifications.

Issue 6	Policy C1 – Renfrewshire’s Network of Centres, Figure 11 and Proposed Retail Sites in Bridge of Weir	
Development plan reference:	Policy C1 Renfrewshire’s Network of Centres as shown on the Proposals Maps and Figure 11- Renfrewshire’s Network of Centres Role & Function	Reporter: Karen Heywood
Body or person(s) submitting a representation raising the issue (including reference number):		
Dawn Group Ltd (33) Andrew Forrest Properties (85) Railway Paths Ltd (91) Paisley West & Central Community Council (345) Episo Boxes GP (384) Inverclyde Council (1974) Co-operative Group (1977) Tesco Stores Ltd (1829) Paterson Partners (2003) CH Bull and Sons (2038) BAE Systems (2040) NRR (Paisley) Ltd (2054) Bridge of Weir Community Council (2065) Asda Stores Ltd (2103)		
Provision of the development plan to which the issue relates:	Policy to promote Renfrewshire’s Network of Centres	
Planning authority’s summary of the representation(s):		
<u>General</u> <u>BAE Systems (2040)</u> Welcome the identification of a new Local Service Centre (LSC) at Dargavel Village. Support the aspiration to strengthen the offer in Bishopton and have a parallel ambition to create ‘a hub for retail, community and other complementary uses’ (Figure 11 Renfrewshire Network of Centres Role and Function). <u>Tesco Stores Ltd (1829)</u> Tesco store is allocated for employment uses (Policy E3) in the proposal map, however, it functions as an integral part of the adjacent Paisley East End LSC. The land use function of the store and the associated car parking supports the boundary of the Paisley East End LSC being extended. <u>Co-operative Group (1977)</u> Concerned about the Proposed Local Development Plan’s (LDP) approach to LSCs.		

While there is support in terms of the roles and functions as set out in Figure 11 of the Proposed LDP, the plan could do more to protect the centres that are defined. Specifically the plan would benefit from establishing a floorspace threshold for new retail proposals to ensure that any new retail development that comes forward is commensurate with the centre's local shopping function. In this regard, it is suggested that a threshold of 1,000 sqm (gross) floorspace is set for new retail proposals in LSCs.

Retail Warehouse Parks

Episo Boxes GP (384)

The identification of Retail Warehouse Parks within the Network of Centres is supported.

The identification of Phoenix Retail Park on the proposals map includes all other uses at Phoenix and is a much wider zoning than the retail warehouse park. The proposals map is therefore inaccurate and misleading. It could also result in the proliferation of retail uses throughout the whole area which does not appear to be the intention of the plan and is not supported. The proposals map should be adjusted to ensure that the policy relating to the network of centres refers only to the extent of the retail warehouse park at Phoenix. This would bring the plan in line with the references relating to other retail warehouse parks at Abbotsinch and Braehead.

Asda Stores Ltd (2103) and Inverclyde Council (1974)

The use of the term 'Retail Warehouse Park' as a designation within the Network of Centres is questioned as the recognised terminology is 'commercial centres' as stated in Scottish Planning Policy (SPP) (CD/03). It is recommended that the LDP be altered to use the same terminology as set out in SPP (CD/03) to ensure consistency of approach.

Asda Stores Ltd (2103)

Support the strategy as set out in Figure 11 for the Phoenix Retail Park but would like to see the existing convenience retail offer acknowledged and protected within the description of its role and function. In addition, it is recommended that the LDP recognises the role that retailing plays in the local economy, providing investment and employment opportunities.

Paisley Strategic Town Centre

Paisley West & Central Community Council (345)

The initiatives to prevent or limit the further decline of Paisley Strategic Town Centre (STC) as detailed in Figure 11 of the LDP are supported.

NRR (Paisley) Ltd (2054) and Co-operative Group (1977)

The Proposed LDP vision for Paisley is poorly defined and does not create a policy framework that would allow for the challenges facing Paisley STC to be resolved. Paisley STC has little prospect of regenerating and improving if the council offers no protection to the centre and there is little prospect of the centre attracting convenience and independent traders if Braehead benefits from having full town centre status. Object to the proposed LDPs approach to Paisley and Braehead which identifies both as STCs.

NRR (Paisley) Ltd (2054)

The Proposed LDP should establish a more positive and proactive role for Paisley STC and not limit its focus to 'convenience and independent local retailers'. Instead the Proposed LDP should offer support for retail led regeneration of Paisley STC, something that would be a far better fit when it remains at the top of the retail hierarchy in Renfrewshire and is sequentially preferable to Braehead as a 'Commercial Centre'.

Retail Development in Bridge of Weir

Andrew Forrest Properties (85)

Supports Policy C1 and agree that Bridge of Weir, as a LSC, should be improved and strengthened in order to support the provision of retail, leisure and service uses for the inhabitants of the town and the surrounding area. The critical mass of the town should be preserved, in order to avoid losing facilities and thereby decreasing its attractiveness as a place to live.

CH Bull Garage Site, Kilmalcolm Road (Site Ref 5015)

CH Bull and Sons (2038)

Welcomes the conclusion in the Site Assessments Land Use Considerations (CD/06) of site 5015 that residential and/or local convenience retailing would be acceptable subject to the precise scale of any retail component being demonstrated to have no detrimental effect on the vitality and viability of the existing LSC. However, the LDP Proposals Map does not show this site as being allocated for housing and/or convenience retail development. Similarly, there is no reference in the text of the LDP Proposed Plan to indicate a proposal for housing and/or retail development or a policy preference for this site for housing/retail use. As a result there is a lack of clarity, particularly in relation to the proposed retail component. As things stand there is no sound basis for the council to presume against alternative sites should any be brought forward for convenience retail use within Bridge of Weir.

Former station site (Site Ref 2301)

Dawn Group Ltd (33)

A retail impact assessment has not been undertaken as part of this representation however an assessment of the Bridge of Weir LSC, i.e. nature/range/type/quality of retailing and other uses has been carried out and the conclusion to be drawn is that a new 10,000 sq ft convenience unit on this site would strengthen the retail offer of the village and would reduce expenditure leakage while simultaneously not undermining the vitality and viability of the rest of the centre. This site should be identified as a potential new retail opportunity in the LDP.

Railway Paths Ltd (91)

The former station site can be clearly viewed as a historical centre and therefore centre type uses would be appropriate and better located for sustainable patterns of transport. Bridge of Weir LSC should be extended to the east to include this site.

Bridge of Weir Community Council (2065)

The coal yard business is a vibrant and much needed facility in the village and the loss of this facility would be detrimental to the overall amenity of the village. The development of a supermarket on this site would be contrary to enhancing the existing village centre. Experience in other areas clearly shows that out of town and edge of town retail developments lead to a substantial drop in town centre activity. A major development in this area is of concern to local residents as: it would require considerable upgrading to the existing road infrastructure; it would impact on the sustrans cycle path (there are still ambitions within the local population to revive the rail line and the proposed development would kill off this aspiration); the capacity of the sewer infrastructure is generally considered to be lacking and further large scale development would exacerbate this; and, residents value the village feel which would be lost as a result of this development. If the derelict ground at Bull's garage is to be redeveloped, then that is where any new small retail units should be located. It is close to the existing village centre and main shopping areas of Livery Walk and Neva Place. It has easy access from the main street and would add to the vibrancy of the village centre.

Whitelint Gate (Site Ref 5028)

Paterson Partners (2003)

This is a 5.4ha sustainable brownfield site perfectly suited for a retail and housing development and therefore the green belt boundary should be amended to exclude the site. The site is recognised as having development potential and is effective in terms of access and drainage, is suitably positioned in terms of landscape, there are no impediments to viable development and it is within single ownership. The site is capable of development without significantly affecting the wider landscape character.

The owner is promoting two options for the development of this site. The 'preferred' Option 1 comprises the development of a 35,000 – 40,000sqft retail facility with a residual area for housing. Option 2 would comprise 40 family houses and 15 affordable/keyworker units, these units could be private shared equity tenure. There may also be an opportunity to provide 5 - 10 small employment/business units to assist local employment generation.

There is clear evidence to support the capacity for a medium size retail facility within Bridge of Weir as reflected in the Council's site assessment (CD/06), the LDP technical and supplementary documents as well as the retail assessment (CD/13) lodged on behalf of the owners for Whitelint Gate. A significant amount of retail expenditure is currently lost from Bridge of Weir and a medium sized retail store can arrest this leakage as well as enhancing the vitality and viability of the local centre by attracting more people to the area. The Whitelint Gate brownfield site is the only viable location for such a facility, with operator interest in development. Other areas, such as the Bulls Garage site, have been promoted for many years for a variety of uses, including retail, however these have been discounted due to site restrictions.

These options can effectively be developed within a 2 – 3 year timescale as both have operator interest in development of the site for retail and residential. Both options would be developed with a number of community benefits including a 12 hectare community woodland with a network of access routes linking into surrounding areas and the existing cycle route and a contribution of £500,000 to be transferred to a suitable representative

body to administer the funds directly towards the local area.

Modifications sought by those submitting representations:

Paisley East End LSC should be extended on the Paisley Proposals Map to cover the Tesco store on East Lane and the associated car park. The employment allocation on the site should also be removed. (1829)

Amend the plan to introduce a 1000 sqm (gross) floorspace threshold on new retail developments in LSCs. (1977)

Change all instances of 'retail warehouse parks' to 'commercial centres' in the Plan and in the New Development Supplementary Guidance (CD/09). (2103, 1974)

The existing convenience retail offer within the Phoenix centre should be acknowledged and protected within the description of its role and function in Figure 11. Also within this section the role that retailing plays in the local economy, providing investment and employment opportunities should be recognised. (2103)

The Phoenix Retail Park identified on the proposals map should be adjusted so as to only relate to the retail warehouse park as identified in the 2006 Local Plan. (384)

The LDP should support retail led regeneration of Paisley town centre rather than the limited focus of 'convenience and independent local retailers' as detailed in Figure 11. (2054)

Figure 11 - Local Service Centres, Bridge of Weir should be amended with the addition of the following sentence under 'Challenges and Opportunities': "In particular, the C H Bull site at Kilmacolm Road in Bridge of Weir has potential for redevelopment to provide improved convenience retail facilities, possibly in association with housing. The site is therefore allocated for such uses on the Proposals Map." The text on Page 17 of the LDP Proposed Plan should also be amended to reflect the above wording. (2038)

The former Station site should be identified as a potential new retail opportunity in Figure 11 of the LDP. (33)

The Proposals Map should be amended to extend Bridge of Weir Local Service Centre to the east to include the former station site. (91)

The greenbelt boundary should be amended to exclude the Whitelint Gate site. (2003)

Figure 11 should be amended to identify that Bridge of Weir requires a medium sized retail store to prevent extensive retail leakage of expenditure and unnecessary and unsustainable private vehicle trips. (2003)

Summary of responses (including reasons) by planning authority:

General

BAE Systems (2040)

Support for the identification of Dargavel Local Service Centre (LSC) in Bishopton is noted.

Tesco Stores Ltd (1829)

It is agreed with the respondent that the boundary of Paisley East LSC should include the Tesco store and associated car park located at East Lane. This site should be covered by Policy C1. The existing Tesco store was omitted from the LSC on the proposals map in error, this store makes an important contribution to the local convenience shopping provision in this area and it is agreed that this should be reflected by its inclusion within the centre. If the reporter is so minded it is proposed that the boundary of Paisley East End LSC on Proposals Map E be changed to include the Tesco Store and associated car park which is located in East Lane.

Co-operative Group (1977)

The proposed LDP and accompanying New Development Supplementary Guidance (SG) (CD/09) promotes LSCs as an important component within Renfrewshire's Network of Centres and will support developments that strengthen the network and enhance its centres. Importantly, the proposed LDP must be read in conjunction with the New Development SG (CD/09). The New Development SG (CD/09) is clear that proposals within a LSC should demonstrate that they will meet local need and will not impact on the vitality and viability of the existing centre or any other network centre. It is also recognised that these centres have more localised catchment areas and therefore the scale of development proposal should reflect the size of community that the centre serves. The council is satisfied that the proposed LDP and New Development SG (CD/09) will protect and promote development opportunities within LSCs to support and enhance the network of centres. Furthermore, in the case of Linwood LSC, the regeneration of this centre will be secured through a retail development which will exceed the suggested threshold but this proposal will strengthen the network and will result in dramatic improvements in terms of the vitality and viability of this centre. A restrictive threshold for new retail proposals in LSCs is not required and the suggested modification is rejected.

Retail Warehouse Parks

Episo Boxes GP (384), Asda Stores Ltd (2103) and Inverclyde Council (1974)

If the reporter is so minded all reference to 'Retail Warehouse Parks' as a designation within the Network of Centres in the proposed LDP will be replaced with the term 'Commercial Centres' to reflect the terminology within SPP (CD/03) and to ensure consistency of approach.

Asda Stores Ltd (2103)

The Phoenix Centre is recognised as an out of town retail and commercial centre and it is not considered necessary to change this description to specifically identify the existing

convenience offer or any other uses currently present within this centre. While the existing convenience offer is important to the success of this centre, the LDP will not promote future local convenience retail development within Commercial Centres as this could undermine the strength of the network. Appropriate convenience retail development could be considered acceptable within Commercial Centres in line with the proposed LDP and New Development SG (CD/09) where they are complimentary to existing uses and the function of the centre. Proposals must demonstrate that there would be no significant adverse impact upon the role and function of any other Network Centre. The proposed LDP and New Development SG (CD/09) are clear that retailing, along with a range of other complimentary uses, is vital in ensuring a vibrant network of centres within Renfrewshire. Its role within the proposed LDP is not underplayed and in terms of the Phoenix Centre appropriate retail and commercial uses will be supported to maintain this centre as a viable retail location. The suggested modifications are not considered necessary and are therefore rejected.

Episo Boxes GP (384)

The boundary of the Phoenix Centre is not proposed to change, however, it will now be defined as a 'Commercial Centre' in line with the above comments. The strength of this Commercial Centre extends beyond the range of uses within the area identified as a Retail Warehouse Park in the Renfrewshire Local Plan 2006 (CD/14). These uses are important to the future vitality and viability of this area. Therefore as shown on the proposals map, the Commercial Centre will extend to include the wider range of uses in this area. This will not lead to a proliferation of retail uses as suggested. In terms of the sequential test, retail proposals will be directed to the Strategic and Core Town Centres in the first instance and in accordance with the New Development SG (CD/09) any proposal will be required to demonstrate that it does not undermine the principal function of the centre, it is complimentary to existing uses and activities and that there would be no significant adverse impact upon the role and function of any other network centre. The suggested modification is rejected and the boundary of Phoenix Commercial Centre will remain as identified on the Proposals Map.

Paisley Strategic Town Centre

Paisley West & Central Community Council (345)

Support for the approach in relation to Paisley Strategic Town Centre is welcomed.

NRR (Paisley) Ltd (2054) and Co-operative Group (1977)

The proposed LDP provides a policy framework which will support growth and the regeneration of Paisley STC. The proposed LDP recognises that the success of Paisley STC is dependent upon maximising the opportunity provided by its existing assets and allowing for a greater mix of uses to improve the vitality of the centre. Retail development will remain an important part of this regeneration, however, Policy C1 and Figure 11 recognise that the future role and function of Paisley STC needs to be more than a focus on retail uses, therefore a diversity of uses are promoted rather than relying simply on retail-led regeneration.

In terms of Braehead STC, issues concerning the status of this centre are addressed in Issue 8 – Braehead. The proposed LDP identifies a network of centres with each centre having different attributes and strengths which adds to the overall strength of the network.

It is clear that the plan identifies both Paisley Town Centre and Braehead as STC's at the top of the hierarchy of the network of centres due to their role and function within Renfrewshire. Therefore, while it is recognised that Braehead STC is the best placed centre within Renfrewshire to accommodate future retailing trends and it is identified as the principal retail centre, in policy terms this centre is not sequentially preferable to Paisley STC.

The spatial strategy for Paisley STC is identified in Figure 13, however, the proposed LDP does not go into great detail in terms of the vision or strategy for its centres. The LDP Action Programme details ongoing work with key partners which will identify priorities for action in Paisley STC, however, more clarity is needed in terms of the Programme of Delivery. Therefore, if the reporter is so minded the first bullet point of the Programme of Delivery on Page 21 of the proposed LDP should be amended to read:

Work in partnership to develop a Centre Strategy for each centre to strengthen the role, function and diversification of uses within Renfrewshire's Network of Centres.

The LDP Action Programme can be amended to reflect this and to identify that each strategy will be supported by a Town Centre Health Check.

Retail Development in Bridge of Weir

Andrew Forrest Properties (85)

Support for Policy C1 in relation to Bridge of Weir LSC is welcomed.

CH Bull and Sons (2038), Railway Paths Ltd (91), Paterson Partners (2003)

The lack of convenience retail provision within Bridge of Weir does result in a considerable amount of retail expenditure being lost to other areas. This leads to unsustainable travel patterns in the area and it is therefore agreed that there is capacity within Bridge of Weir for a local convenience retail development to support the LSC. The scale of this development and its impact on the Bridge of Weir LSC and other centres in the network would be fully considered as part of a planning application. It is accepted that there are limited opportunities for a new convenience store within the defined Bridge of Weir LSC and meeting the local need may require a new store to be located out with the centre. Three sites were suggested to the council through the Suggestions for Land Use Change process. It is considered that identifying one preferred site on the proposals map would narrow the options for redevelopment and would not be in keeping with the Policies in the proposed LDP which promote flexibility. Therefore, the proposed modifications to Figure 11 and the proposals map in this respect are rejected.

CH Bull Garage Site, Kilmalcolm Road (Site Ref 5015)

CH Bull and Sons (2038) and Bridge of Weir Community Council (2065)

The council recognise that this is an existing operational commercial site in the middle of the village. Should the current use cease operation then this site poses a good opportunity for redevelopment for various uses including retail given its sustainable location within the existing settlement and the edge of the LSC.

The new proposed LDP zoning covering this site (Policy P1) allows for development which is compatible and complementary to existing uses, aiming to allow for a range of development opportunities that improve places and create attractive environments. A planning application to assess the compatibility and the design aspects of any development could be submitted at any time, rather than singling out an existing operating business as an individual development opportunity site. A convenience retail development could be appropriate subject to the proposal being considered in relation to Policy C2 in the proposed LDP. The Policy P1 zoning is appropriate for this site.

Former station site (Site Ref 2301)

Dawn Group Ltd (33), Railway Paths Ltd (91) and Bridge of Weir Community Council (2065)

As with the CH Bull Garage site the proposed LDP zoning covering this site is Policy P1. This policy increases flexibility should the site come forward for redevelopment in the lifetime of the plan. It allows for development which is compatible and complementary to existing uses, aiming to allow for a range of development opportunities that improves places and creates attractive environments. A planning application could be submitted for this site which seeks to address these requirements and only then could impact on the STC, compatibility and the design aspects be fully considered. Any detailed retail proposal for this site would have to be considered in relation to Policy P1 and C2 in the proposed LDP. It should be noted that the council does have concerns regarding the suitability and deliverability of this site for a retail development. In particular there are concerns about the existing vehicular access constraints, the ability of this site to accommodate a supermarket with the required parking while making a positive contribution to the overall place.

Whitelint Gate (Site Ref 5028)

Paterson Partners (2003)

In line with the submitted retail capacity assessment in support of retail development at this site, it is agreed that a retail development within Bridge of Weir would reduce the current leakage of retail expenditure which gives rise to unsustainable travel patterns in the area. It is also agreed that further clarification is required in terms of the 'Challenges and Opportunities' for Bridge of Weir LSC as detailed in Figure 11 of the Proposed LDP. Therefore, if the reporter is so minded this section of Figure 11 should be amended to read:

'Improvements in public realm as well as development of gap sites with appropriate uses to strengthen the quality of the centre's environment. Opportunity to strengthen local convenience retail offer within the village.'

Although the council would disagree that there should be a reference to the scale of the store within the LDP, as this would be fully considered as part of a planning application.

It is agreed that the area of the site that was previously used as a landfill site can be considered as brownfield land which has regenerated and contains a range of vegetation and trees. It is also considered that over the years the site has developed into a woodland area at the gateway to the settlement, creating a natural setting at the edge of Bridge of Weir. Rezoning this land for development or identifying this site as part of the built up area within the settlement would require the formation a new defensible boundary edge for which a 12 hectares of community woodland has been proposed by the landowner on

existing open and undulating agricultural fields to the east of the village. However allowing development of agricultural land in line with the details submitted would result in the loss of both a naturally vegetated area and farmland. Furthermore the new indigenous trees will take some time to establish into a community woodland and replace the woodland edge that already exists. It is considered that the site for development does have a degree of containment. However the fields to the east of the existing woodland area have a very open aspect to the other surrounding grazing fields with poor containment. Allowing development at this location, with the removal of a defensible boundary edge, would result in the possibility of development spreading along these fields which in turn would have an adverse impact on the landscape character as well as the visual profile of the area, therefore, such development is undesirable.

It is agreed that the retail development could be delivered within the lifetime of the Plan. Any retail proposal would have to be fully considered in relation to Policy ENV1 and C2 of the proposed LDP, nevertheless, it is considered that this site is undesirable for development. The proposed modification to the green belt boundary in this location is rejected.

Reporter's conclusions:

General

1. The council and Tesco Stores Ltd agree that the boundary of Paisley East Local Service Centre should include the Tesco store and associated car park located at East Lane and that this site should be covered by Policy C1. The council has acknowledged that the existing Tesco store was omitted from the local service centre on the proposals map in error. It considers that this store makes an important contribution to the local convenience shopping provision in this area and should have been included. I agree with this analysis.
2. Policy C1 – Renfrewshire Network of Centres states that all proposals will be considered in line with the hierarchy, role and function of the centres detailed in Figure 11 and against the development criteria set out within the New Development Supplementary Guidance. The policy in the local development plan and the Supplementary Guidance must be read together. The Supplementary Guidance states that proposals within a Local Service Centre should demonstrate that they will meet local need and will not impact on the vitality and viability of the existing centre or any other network centre and that the scale of development proposal should reflect the size of community that the centre serves.
3. I agree with the council that the proposed local development plan and the New Development Supplementary Guidance together will protect local service centres and support and enhance the network of centres. I do not consider it is necessary for a floorspace threshold for new retail proposals. The suggested 1000 square metre figure appears to me to be an arbitrary figure. While it may be suitable for one local service centre, it could be entirely inappropriate for another, depending on local circumstances.
4. In its consideration of the representations summarised in this Schedule 4 the council has decided that more clarity is needed in terms of the Programme of Delivery on page 21 of the plan. The local development plan Action Programme would be amended to reflect the change by the council and to identify that each strategy will be supported by a Town Centre Health Check. The council suggests that the first bullet point of the

Programme of Delivery should be amended to read:

“Work in partnership to develop a Centre Strategy for each centre to strengthen the role, function and diversification of uses within Renfrewshire’s Network of Centres”.

5. I agree with this suggested change.

Retail Warehouse Parks

6. The council agrees that all reference to “Retail Warehouse Parks” as a designation within the Network of Centres in the proposed plan should be replaced with the term “Commercial Centres” to reflect the terminology within SPP (CD/03) and to ensure consistency of approach. I agree with this analysis.

7. Figure 11 – Renfrewshire Network of Centres Role & Function on page 18 of the plan indicates that the Phoenix Centre is an “Out of town retail and commercial centre”. The description of retail includes all forms of retailing, including convenience retailing. The policies of the plan and the Supplementary Guidance require that any proposals for new convenience retailing must demonstrate that there would be no significant adverse impact upon the role and function of any other network centre. I, therefore, agree with the council that it is not necessary to change this description to identify the existing convenience floorspace in order to protect the commercial centre (or retail warehouse park as it is labelled in the plan).

8. ASDA asks that the plan recognises the role that retailing plays in the local economy. In my view, that is exactly what the suite of retailing policies, the identified network of centres and the Supplementary Guidance do.

9. The area at the Phoenix identified as a retail warehouse park in the proposed plan (to be changed to a commercial centre) includes a wide range of uses. There is a retail warehouse park, a leisure section, including a hotel, a multiplex cinema, fast food outlets and restaurants, an area devoted to car dealerships and garages and also business pavilions. I agree with the council that the character of this area generally is akin to a mixed leisure and retail commercial centre as defined in Scottish Planning Policy, albeit a commercial centre which contains business uses too.

10. All proposals for new development at the Phoenix will be assessed against the policies in the proposed plan and the New Development Supplementary Guidance and also against the strategic development plan and Scottish Planning Policy. I agree with the council’s view that the sequential test will apply. In addition, any proposal will be required to demonstrate that it does not undermine the principal function of the centre, it is complementary to existing uses and activities and that there would be no significant adverse impact upon the role and function of any other network centre. Consequently I do not consider that the boundary of the commercial centre as shown on the Proposals Map should be changed.

Paisley Strategic Town Centre

11. The representations made by NRR (Paisley) Ltd (2054) and Co-operative Group (1977) concern the town centre status of Braehead and the alleged lack of protection for Paisley town centre and are dealt with under Issue 8.

Retail Development in Bridge of Weir

General

12. The council agrees that the lack of convenience retail provision within Bridge of Weir results in a considerable amount of retail expenditure being lost to other areas. This leads to unsustainable travel patterns in the area. The council also agrees that there is capacity within Bridge of Weir for a local convenience retail development to support the Local Service Centre.

13. Therefore, in Figure 11 of the proposed plan the council suggests that the section under “Challenges and Opportunities” for the Bridge of Weir Local Service Centre should be amended to read:

“Improvements in public realm as well as development of gap sites with appropriate uses to strengthen the quality of the centre’s environment. Opportunity to strengthen local convenience retail offer within the village.”

14. I agree with the suggested amendment. I also agree that there should be no reference to a ‘medium sized retail store’ as the size of any retail development is more appropriately decided at planning application stage.

15. Any retail development proposal for the village would require to be supported by detailed information on the scale of the development, its impact on the Bridge of Weir Local Service Centre and other centres in the network, traffic, cycling and pedestrian connectivity, impacts on residential amenity, landscape impact and urban design. Furthermore, the detailed nature of the information that would need to be provided and the detailed assessment of such information that would be necessary is more appropriately undertaken at planning application stage.

16. Three sites were suggested to the council to be included in the proposed plan. However, I agree with the council that identifying one preferred site on the proposals map would narrow the options for redevelopment and would not be in keeping with the policies in the proposed plan, which promote flexibility. In my view, these policies and the New Development Supplementary Guidance provide a framework for making a detailed assessment of any proposal of this nature. Consequently, I do not consider that Figure 11 and the proposals map should be amended to allocate a particular site in the proposed plan.

CH Bull Garage Site, Kilmalcolm Road (Site Ref 5015)

17. The council recognises that this site was most recently occupied by a commercial use. The council also acknowledges that the site could potentially be a good opportunity for redevelopment for various uses, including retail, given its sustainable location near the centre of the village and on the edge of the Local Service Centre. I agree with the council’s assessment.

18. The site is covered by policy P1, a very flexible policy which would allow for a range of potential uses, as long as the development proposal was compatible and complementary to existing uses. I note that the business has ceased to operate and the site has become vacant since the council submitted the proposed development plan for examination.

Former station site (Site Ref 2301)

19. This site is also covered by policy P1 and a range of potential uses could be suitable, as for the CH Bull site. However, I share the council's concerns regarding the suitability of this site for retail use because of vehicular access constraints and doubts over whether the site would be large enough to accommodate a supermarket and its required car parking in an acceptable manner.

Whitelint Gate (Site Ref 5028)

20. This site is located within the green belt in the proposed plan and is subject to policy ENV1 – Green Belt. This means that only appropriate development which is compatible with the provisions of the New Development Supplementary Guidance will be acceptable (agriculture, horticulture, forestry/woodlands, an established business, essential infrastructure, tourism development). Retail development would not be considered to be acceptable development.

21. The site is brownfield land, having formerly been used as a builders yard and landfill site. This does give it some advantage in terms of any redevelopment proposal. I also note that the council's landscape consultant considered the site to be well contained in landscape terms by the surrounding undulating fields and that mitigation planting would be required to create a new settlement boundary limiting future development.

22. I noted at my site visit that, although the site may be regarded as derelict land, it has naturally regenerated over the years since it was used and is covered with shrubs and trees. I agree with the council's assessment that it has developed into a woodland area at the edge of the settlement, creating a ready-made natural setting for this western edge of the village. Development of the site would remove most, if not all of the existing vegetation. A community woodland would be planted on the fields to the west of the site to compensate for this removal.

23. The council points out that developing the site itself and planting the woodland on its western edge would result in the loss of both a naturally vegetated area and farmland. The council is also concerned that the new woodland would take some time to establish and replace the woodland edge that already exists. I consider that this would be a sensible option only if there were a pressing need for a retail development that could not be met on a suitable site within the village. As I have already explained above, considerable detailed information would need to be submitted and assessed to determine whether the submitted alternative sites were suitable for retail development. At this stage, therefore, I do not consider that it is sensible to allocate the Whitelint Gate site for retail use.

24. The expressions of support submitted by BAE Systems (2040); Paisley West & Central Community Council (345); Andrew Forrest Properties (85) are not unresolved representations and do not require to be considered as part of the local development plan examination.

Reporter's recommendations:

1. The boundary of Paisley East End Local Service Centre on Proposals Map E should be changed to include the Tesco Store and associated car park in East Lane and this area should be included within the area covered by Policy C1 (LSC).

2. The first bullet point of the Programme of Delivery on page 21 should be replaced with the following bullet point:

“Work in partnership to develop a Centre Strategy for each centre to strengthen the role, function and diversification of uses within Renfrewshire’s Network of Centres”.

3. All reference to “Retail Warehouse Parks” as a designation within the Network of Centres in the proposed local development plan, including on the Proposals Maps, should be replaced with the term “Commercial Centres”.

4. On Figure 11 on page 18, under the Bridge of Weir Local Service Centre, the paragraph under “Challenges and Opportunities” should be replaced with the following paragraph:

“Improvements in public realm as well as development of gap sites with appropriate uses to strengthen the quality of the centre’s environment. Opportunity to strengthen local convenience retail offer within the village.”

Issue 7	Policy C2 – Development Out with the Network of Centres	
Development plan reference:	Policy C2 – Development Out with the Network of Centres	Reporter: Karen Heywood
Body or person(s) submitting a representation raising the issue (including reference number):		
Railway Paths Limited (91)		
Provision of the development plan to which the issue relates:	Policy C2 sets out criteria to allow for the consideration of retail and commercial developments proposals out with the network of centres.	
Planning authority's summary of the representation(s):		
Railway Paths Limited (91)		
Policy C2 should be amended to add a bullet point which would allow the sequential approach to be modified by consideration of access to the green network.		
Modifications sought by those submitting representations:		
An additional bullet point should be added to Policy C2 <ul style="list-style-type: none">“the sequential approach can be modified by consideration of access to green networks”. (91)		
Summary of responses (including reasons) by planning authority:		
Railway Paths Limited (91)		
The sequential approach is defined in Scottish Planning Policy (SPP) (CD/03) and allows for flexibility to ensure that different types of retail and commercial uses are developed in the most appropriate location. This is reflected in Policy C2. Furthermore the Connecting Places Policy I1 of the proposed LDP and the New Development Supplementary Guidance (pg13) (CD/09) identify access and connectivity to walking, cycling and public transport networks as a key consideration when assessing development proposals within Renfrewshire which would include any retail or commercial development out with the network of centres. The council continues to support Policy C2 in the proposed LDP and do not consider the proposed modification to be necessary.		
Reporter's conclusions:		
Railway Paths Limited		
1. Any proposal for retail development would be assessed against the relevant policies		

of the local development plan and the New Development Supplementary Guidance. Access and connectivity to walking, cycling and public transport networks are key considerations for the assessment of any proposal. Accordingly, I agree with the council that there is no need to add the additional bullet point to Policy C2 as suggested.

Reporter's recommendations:

No modifications.

Issue 8	Braehead	
Development plan reference:	Centres – Braehead	Reporter: Karen Heywood
Body or person(s) submitting a representation raising the issue (including reference number):		
Glasgow City Council (204) Paisley West and Central Community Council (345) Diageo (Scotland) Ltd (497) John Lewis plc (1797) West Dunbartonshire Council (1966) Intu Properties plc (1967) Retail Property Holdings (1972) St Enoch Centre Investors (1973) Inverclyde Council (1974) David Dunlop (1976) Co-operative Group (1977) NRR (Paisley) Limited (2054) Braehead Properties Limited (2078) Buchanan Partnership (2084)		
Provision of the development plan to which the issue relates:	The plan recognises Braehead as a town centre within the context of Renfrewshire’s Network of Centres and sets a spatial strategy for the centre (Figure 12).	
Planning authority’s summary of the representation(s):		
Statements of support.		
<u>Intu Properties plc (1967)</u>		
Intu Properties (formerly Capital Shopping Centres) support the strategy for Braehead Centre set out in the proposed LDP. Braehead has been a crucial economic driver and catalyst for regeneration of the Clyde Waterfront, and has contributed greatly to the realisation of the desire to achieve urban renewal, environmental improvement and economic growth and is central to the strategy for the continuing renewal of the Clyde Waterfront as set out in the Glasgow & The Clyde Valley Strategic Development Plan (CD/02). Without the enhancement, expansion and regeneration of Braehead set out in the proposed LDP, the Centre’s vital roles as major economic driver, Town Centre and Strategic Centre will be severely compromised.		
Intu have demonstrated their support for the strategy of the proposed LDP by submitting an application for planning permission in principle to carry out developments which will strengthen and further diversify Braehead’s many roles and functions, create substantial new employment opportunities, enhance its role as town centre to a growing residential and business community, deliver major transport improvements and provide major enhancements to the environment of this part of Renfrewshire.		

The policy framework supporting Braehead being designated as a town centre has been emerging for more than ten years. The centre's future designation was anticipated by the Secretary of State for Scotland when he approved the Braehead proposals in June 1990, but successive development plan reviews judged that the centre was not ready to be recognised as a town centre. When approving the Glasgow & the Clyde Valley Structure Plan (CD/15) in 2002, Scottish Ministers recognised that in due course Braehead would assume certain town centre functions as the main centre for Renfrew Riverside, and in 2005 the Reporter who considered objections to the Renfrewshire Local Plan judged Braehead to be a town centre in the making (CD/16).

As has been demonstrated by the past and current development plan approach to the future of Ravenscraig in North Lanarkshire, town centres do not have to exist on the ground in order to be designated as such, as they can take the form of a planned and committed town centre.

Braehead, however, is a centre which has been developing since 1999, providing the basis for the development of a new residential and business community around it, catering for a wide range of needs, and becoming Renfrewshire's principal shopping centre, leisure destination and centre for employment.

Scottish Planning Policy (SPP) (CD/03) expects town centres to have a diverse mix of uses and attributes. The area which the proposed LDP has designated as Braehead Town Centre contains these features and the further development at Braehead envisaged in the proposed LDP will enhance and expand these features.

Town centres can take many forms. Some of the centres in Glasgow which have been designated as town centres, such as Glasgow Fort and Silverburn, are fairly limited in terms of the range of facilities which they offer, and are primarily focused on shopping.

Analysis of expenditure patterns and the effect of recent and planned retail developments, has demonstrated capacity for these proposals, and has illustrated the importance of the Braehead development proposals to ensure protection and enhancement of its roles and functions.

Intu have played a major role in delivering many of the current town centre attributes at Braehead delivering the first commercial buildings at both Riverside Braehead and Titanium Business Park, creating a public park, selling land for residential and retirement development, as well as providing the site for the new police station.

The approved Strategic Development Plan (CD/02) recognises Braehead as a Strategic Centre where regeneration and diversification is supported, in order to promote the aims of the SDP on Clyde Waterfront. The proposed LDP has drawn up a strategy to ensure that the enhancement of Braehead can be achieved, and its many roles strengthened and broadened through physical and functional change. Central to this strategy is the designation of Braehead as a town centre, to reflect its existing role and function and to provide the proper planning policy basis for its future protection and enhancement.

Objections.

Glasgow City Council (204)

Braehead is not identified as a town centre in the approved Strategic Development Plan (CD/02) nor the Renfrewshire Local Plan (CD/14) and therefore this is a major policy change. Renfrewshire Council appears to consider that Braehead currently displays the characteristics of a town centre but no evidence is presented to support this position. GCC's view is that Braehead more resembles the characteristics of a commercial centre as defined by Scottish Planning Policy (CD/03) rather than the SPPs (CD/03) definition of a town centre.

GCC agrees with the Scottish Ministers' assessment that 'Braehead lacks town centre diversity' a view expressed in the assessment of the third alteration to the Glasgow and Clyde Valley Structure Plan 2006 (CD/17). GCC's view is that there has been no change in the role and character of Braehead in the intervening period.

The Masterplan set out within the proposed LDP would introduce some of the requisite characteristics of a town centre however there is no certainty as to what elements of the Masterplan will be delivered. This is no basis on which to award town centre status and therefore the designation in the LDP is premature.

In any case the Masterplan does not introduce the civic and community uses that are found in Glasgow's strategic town centres including Pollock and Easterhouse which otherwise resemble Braehead in their inclusion of mall type retail developments. There is a lack of a demand context for further retail development at Braehead. This is likely to have significant impacts on other strategic centres including Glasgow City Centre.

If Braehead is established as a town centre it will establish a precedent for other commercial centres with similar retail and commercial basis to similarly adapt their layout to take on the appearance of a town centre, without the fundamental diversity of uses.

Paisley West and Central Community Council (345)

Are concerned that the terms "town centre" and "town centre character" may be ways to circumvent detailed planning requirements.

There is no indication of how development at Braehead and the consequent draw on shopping and economy will be mitigated across the rest of Renfrewshire. Further expansion at Braehead and the current effect of Silverburn will lead to a further reduction in spend in town centres, with the greatest impact on Paisley.

Diageo (Scotland) Ltd (497)

Do not object to the changes in land use policy however point out that recognition requires to be given to the importance of their Shieldhall plant in operational terms and the potential of changes in land use policy to increase activity and congestion in the area. This can cause operational difficulties.

John Lewis plc (1797)

The centre should not be afforded the zoning of town centre in the emerging plan as it does not provide the attributes that a town centre should.

Paragraph 54 of SPP (CD/03) provides the reasons why the Braehead shopping centre should not be afforded town centre status and goes on to describe a commercial centre,

which Braehead is currently zoned as.

The SDP (CD/02) recognises Braehead as one of the strategic centres in the regions network of centres however the SDP (CD/02) does not indicate how Braehead offers the opportunity to provide the services, facilities and general feel of a town centre.

The SDP (CD/02) states that the challenges facing Braehead are to diversify its role and functions, and it identifies the future action required for the centre as being to bring forward a masterplan for the further regeneration of the centre and wider environment. The recent planning application submitted to Renfrewshire Council proposes significant increases in the retail and leisure floor space but very little in the way of cultural or community uses.

West Dunbartonshire Council (1966)

Objects to the designation of Braehead as a town centre. The proposed LDP does not make the case for this change in designation. The justification offered is that town centre status is important to secure the regeneration of the Clyde Waterfront. This is not accepted by WDC who do not view this area as in need of physical regeneration or accept that it achieves the regeneration of the wider Clyde Waterfront area.

Scottish Planning Policy (CD/02) states that any change in the network of centres should be justified using the results of a health check, the proposed LDP offers no evidence that this has been done. The SPP (CD/02) differentiates between town centres and commercial centres and Braehead matches the definition of a commercial centre. It lacks the diversity of uses and does not have a community focus, there is no town of Braehead.

The Renfrew Riverside residential area does not justify a town centre the size of Braehead and is adequately served by Renfrew town centre.

WDC's main concern is the impact of further retail development at Braehead on West Dunbartonshire's town centres and Glasgow City Centre. The shopping catchment of Braehead extends beyond Renfrewshire and covers a significant area of West Dunbartonshire. Additional retail floorspace at Braehead would increase trade draw from West Dunbartonshire at the expense of its town centres and will largely be by means of private car.

An additional concern is the impact on the City Centre, a significant retail destination at a UK level and a significant economic driver of the city region. Its ability to attract new investment is at risk from out-of-centre locations such as Braehead.

A town centre is not simply a planning designation. It is a place that evolves through time to serve a community. The designation of Braehead as a town centre would completely redefine the understanding of the term.

It is not considered appropriate that such a significant change should be driven by a Local Development Plan.

Intu Properties plc (1967)

There are inconsistencies in the wording of the 'Clyde Riverside' sub-section of the 'Centres' section –

- Paragraph 1 states “There is a need for Braehead as a place to develop a town centre rather than shopping mall character and this must have a bearing on all proposals that emerge in the future”.
- Paragraph 3 states “There is a need for Braehead to continue to develop its town centre character, to reflect its identification as a new town centre in Renfrewshire”.

This latter wording more accurately reflects the current situation, as Braehead already functions as a town centre, but needs to continue to develop its town centre characteristics, and is already far more than just a shopping mall.

There are three minor deficiencies in Figure 12:

1. The existing Travelodge hotel at the western end of the town centre is shown as ‘business /commercial use’. A more accurate description would be ‘Existing Hotel’.
2. The orange ‘leisure’ areas between Xscape and the indoor centre form part of the town centre expansion. A more accurate description would be ‘Proposed Town Centre Leisure Expansion’.
3. The red area labelled ‘Proposed Town Centre Expansion’ forms only one part of the overall expansion of Braehead, in this case the retail element. A more accurate description would be ‘Proposed Town Centre Retail Expansion’.

Retail Property Holdings (1972)

Object to the proposed designation of Braehead as a Strategic Town Centre

The designation is contrary to Scottish Planning Policy (CD/03). Town centres as opposed to other commercial centres should be the focus of investment in retail and commercial leisure development. While Braehead might be identified as part of a network of centres this cannot imply that town centre status is either appropriate or justified. Town centre status opens the door to substantial additional retail floorspace without ensuring that the diversity of uses and functions inherent in a town centre is delivered.

Braehead exhibits the characteristics of a commercial centre rather than a town centre as defined in SPP (CD/03). It is identified as a Commercial Centre in the SDP(CD/02). SECI does not object to appropriate investment to improve Braehead but is concerned that the likely scale of development, as evidenced by the current planning permission in principle (PPP) application (CD/18), will have an adverse effect on town centres.

The SPP (CD/03) sets out the sequential approach that is to be used when selecting locations for all retail and commercial leisure development, unless the development plan provides an exception. If the proposed LDP retains Braehead as a commercial centre it will be necessary for the developer to demonstrate that there are no suitable alternative locations for their development elsewhere. This has not been done in either the LDP or the PPP application.

The proposed LDP does not conform to the SDP (CD/02) which defines Braehead as a commercial centre in a network of strategic centres. The SDP (CD/02) sets a key challenge for Braehead to diversify the roles and functions of the centre with no specific reference to further retail floorspace or a designation of a town centre.

Town centre status for Braehead will do nothing in support of SDP (CD/02) Strategic

Support Measure 11 that seeks to arrest the decline of traditional town centres. This measure also seeks to protect Glasgow City Centre as central to the SDP Spatial Development Strategy. Town centre status for Braehead will allow unlimited expansion of retail and commercial leisure and directly undermine the City Centre.

As evidence of the expansion planned at Braehead the current PPP application (CD/18) demonstrates that there are no proposals for educational, civic, cultural, residential institutions, non residential institutions (crèche, library, place of worship), health centres or surgeries. The proposed development will do nothing other than increase the scale of retail and commercial leisure offer in an already substantial out-of-centre location.

The proposed LDP does not provide the evidence to indicate what level of investment might be required or the mechanism for ensuring that investment is channelled into securing diversification and the creation of a genuine new town centre.

St Enoch Centre Investors (1973)

Object to the proposed designation of Braehead as a Strategic Town Centre

The designation is contrary to Scottish Planning Policy (CD/03). Town centres as opposed to other commercial centres should be the focus of investment in retail and commercial leisure development. While Braehead might be identified as part of a network of centres this cannot imply that town centre status is either appropriate or justified. Town centre status opens the door to substantial additional retail floorspace without ensuring that the diversity of uses and functions inherent in a town centre is delivered.

Braehead exhibits the characteristics of a commercial centre rather than a town centre as defined in SPP (CD/03). It is identified as a Commercial Centre in the SDP (CD/02). SECI does not object to appropriate investment to improve Braehead but is concerned that the likely scale of development, as evidenced by the current planning permission in principle application, will have an adverse effect on town centres.

The proposed LDP does not conform to the SDP (CD/02) which defines Braehead as a commercial centre in a network of strategic centres. The SDP (CD/02) sets a key challenge for Braehead to diversify the roles and functions of the centre with no specific reference to further retail floorspace or a designation of a town centre.

Town centre status for Braehead will do nothing in support of SDP (CD/02) Strategic Support Measure 11 that seeks to arrest the decline of traditional town centres. This measure also seeks to protect Glasgow City Centre as central to the SDP Spatial Development Strategy. Town centre status for Braehead will allow unlimited expansion of retail and commercial leisure and directly undermine the City Centre.

As evidence of the expansion planned at Braehead the current PPP application (CD/18) demonstrates that there are no proposals for educational, civic, cultural, residential institutions, non residential institutions (crèche, library, place of worship), health centres or surgeries. The proposed development will do nothing other than increase the scale of retail and commercial leisure offer in an already substantial out-of-centre location.

The proposed LDP does not provide the evidence to indicate what level of investment might be required or the mechanism for ensuring that investment is channelled into securing diversification and the creation of a genuine new town centre.

Inverclyde Council (1974)

Braehead does not fulfil all of the characteristics of a town centre in terms of its role and function and instead reflects the definition of a commercial centre.

There is no indication of what scale of development will be for retail use. Braehead already attracts expenditure from Inverclyde and this would be exacerbated with further retail floorspace. The City Centre would be impacted particularly with the emphasis on Fastlink to provide an alternative means of access to the private car.

Town centre status would allow very little control for Braehead to beyond the level of retail floorspace indicated in Figure 12.

David Dunlop (1976)

Objects to the designation of Braehead as a town centre

It fails to meet the Scottish Government's sequential test for defining a town centre; it is not in the centre of a town; it has no local pedestrian footfall; it does not have the range of facilities that would be found in a town centre; and Renfrew already has a town centre.

Objecting on the basis of the likely impact on neighbouring town centres, particularly Paisley.

It will undermine the small independent entrepreneurial retail base of Renfrewshire.

It will undermine the offer in communities with low choice, low mobility and low car ownership.

The proposal entirely contradicts current town centre thinking e.g. sustainable development, walkable centres, Mary Portas' work, Malcolm Fraser Study.

Co-operative Group (1977)

Are concerned at the move to define Braehead as a town centre. The approved SDP (CD/02) establishes it as a commercial centre.

NRR (Paisley) Limited (2054)

Defining Braehead as a town centre is at odds with the SDP (CD/02) that defines it as a commercial centre. Retail development should therefore be directed towards Paisley town centre. The SDP sets out Braehead's challenges as the diversification of its role and functions not the expansion of its retail floorspace.

Braehead Properties Limited (2078)

In order to comply with the SDP Braehead's town centre boundary must allow scope for the centre to evolve, expand and adapt. This will maximise the ability for Braehead to meet the challenges specifically identified within the SDP (CD/02). This includes incorporating a range of functions and uses identified as being suitable by the SDP (CD/02) and SPP (CD/03). As currently defined there is no scope for the centre to evolve and expand other than reconfiguration/redevelopment of the existing shopping centre.

<p>Therefore the town centre boundary should be expanded to include the Policy E1 and E3 land along Old Govan Road.</p> <p><u>Buchanan Partnership (2084)</u></p> <p>Objects to the proposed allocation of Braehead as a strategic town centre. The plan states that its spatial strategy is set by the National Planning Framework (CD/19) and Strategic Development Plan (CD/02). However Schedule 12 of the SDP (CD/02) identifies Braehead as a “Commercial centre with retail, leisure, commercial, employment and business.” With the challenges stated being for the diversification of its roles and functions. Therefore Braehead is not allocated as a Town Centre by the SDP (CD/02). Objects to the potential impact of the propose change in status on Glasgow City Centre and existing town centres in Renfrewshire and beyond. It is unclear whether the impact of this has been reviewed. Figure 11 of the Plan confuses the aims and objectives of the sequential approach set by Scottish Planning Policy (CD/03).</p>
<p>Modifications sought by those submitting representations:</p> <p>Removal of paragraphs recognising Braehead as a town centre (1966)</p> <p>Change references to Braehead as a town centre to commercial centre (1972, 1973, 1974, 1977, 2054)</p> <p>Delete Figure 12 – Braehead (1972, 1973)</p> <p>Expand the town centre boundary to include the Policy E1 and E3 land along Old Govan Road. (2078)</p> <p>No explicit modifications sought (204, 345, 497, 1797, 1976, 2084)</p> <p>Replace final sentence of the first paragraph of the Clyde Riverside section (page 16) with, “There is a need for Braehead as a place to continue to develop its town centre character with an appropriate mix of uses, and this must have a bearing on all proposals that emerge in the future”. (1967)</p> <p>Amend Figure 12 as follows:</p> <ol style="list-style-type: none"> 1. The Travelodge hotel to the south-west of Xscape should be labelled ‘Existing Hotel’. 2. The orange areas to the north and south of ‘New civic square’, currently labelled ‘Leisure Use’ should be labelled ‘Proposed Town Centre Leisure Expansion’. 3. The red areas adjacent to the existing indoor centre should be labelled ‘Proposed Town Centre Retail Expansion’. (1967)
<p>Summary of responses (including reasons) by planning authority:</p> <p>The Local Development Plan seeks to set out a rational approach to the role and function of all centres within Renfrewshire. This seeks to direct new development to the locations that are appropriate within that network, consolidate some where appropriate and seek new or evolved functions for others. Renfrewshire Council is very clear about the role of Braehead within Renfrewshire’s network of centres. It functions as a town centre alongside Paisley, Erskine, Johnstone and Renfrew. The council considers that the</p>

proposed modifications fail to understand the relationships between the centres that the LDP sets out and are therefore rejected for the following reasons:

Town centre status

Glasgow City Council(204); West Dunbartonshire Council (1966); Inverclyde Council (1974); St Enoch Centre Investors (1973); Retail Property Holdings (1972); John Lewis plc (1797); NRR (Paisley) Ltd (2054); Co-operative Group (1977); PWCCC (345); David Dunlop (1976)

It is the role of the development plan to identify the status of the centres in its area. Within the Glasgow and Clyde Valley Strategic Development Plan area the SDP authority has taken the view that it would identify the strategic network of centres but not define the status of centres within the constituent authority areas (CD/02) (the response of the Glasgow and Clyde Valley Strategic Development Plan Authority to this issue at its SDP Examination (Issue 28: Network of Strategic Centres)) (CD/27). This has devolved the decision making on the matter of whether Braehead is a town centre to Renfrewshire Council and its LDP. The representations that refer to the SDP's description (Schedule 12) of Braehead as a commercial centre therefore point to its status until changed by this LDP.

Furthermore the SDP's Strategic Support Measure 11 puts the onus on LDPs to manage the development of the network of centres. The LDP sets out Renfrewshire's network of centres and examines the role and functions of each centre and the relationship of each centre to other centres in the network. This is crucially important in Renfrewshire and ensures each centre has a defined role within the hierarchy. Braehead is the primary centre for retail, particularly comparison retailing, in Renfrewshire. In market terms it provides Renfrewshire's prime retail space. The plan explains its role amongst Paisley's, Renfrew's and the other centres in the network.

In planning ahead for the future of all of these centres, the council would not wish to see development in any one centre cause a detrimental impact on another. The regeneration programmes in place for the traditional centres are not focussed on attracting multinational retail operations; they are residential, civic and cultural for Paisley and local shopping and community services for Renfrew. The future of Braehead in Renfrewshire's network must therefore not upset that framework and the plan therefore supports Braehead's strategic status and proposes its town centre status within a framework that seeks to secure the regeneration outcomes for the area. All this clearly delivers the SDP's Strategic Support Measure 11 in Renfrewshire.

Braehead's lack of town centre status is a significant limiting factor in allowing it to continue to evolve. Braehead was conceived in the 1980's as a means of driving the regeneration of the Renfrew North part of the Clyde Waterfront through the provision of residential, employment, leisure and retail uses together with supporting infrastructure. It therefore bears, in planning terms, striking similarities to another regeneration scheme within the Clyde Valley area at Ravenscraig. Here the Glasgow and Clyde Valley Structure Plan (approved by Scottish Ministers on 24th November 2003) (CD/20) designated town centre status for the centre of the scheme, which is yet to be built. This is an example of how the planning system in Scotland has accepted the concept that a centre can be created as a town centre, as there is no possible way in which Ravenscraig town centre could meet the tests for a town centre set out in the then National Planning Policy Guidance 8. For Braehead which has been recognised and referred to as a future town centre (see the Scottish Ministers approval letter for the Glasgow and Clyde Valley Structure Plan 2002)(CD/21) and a town centre in waiting (see the 2004 Reporters' report

on the objections to the Renfrewshire Local Plan) (CD/16) this means that a centre can be conceptualised as a town centre and given that formal status in a development plan if that is the appropriate policy goal.

Nevertheless Renfrewshire Council views Braehead as fulfilling the role of a town centre currently. It already has a diverse mix of uses and attributes, is highly accessible by public and private transport, has an excellent range of shopping and complementary facilities, an evening economy, a well-managed and safe environment, and is relied upon by the surrounding communities which it serves.

The work undertaken in the development of the Strategic Development Plan's identification of strategic centres is presented in the SDP's Main Issues Report (CD/22) and in SDP Background Paper 14 (CD/23). This work on the role and function of centres across the Glasgow and Clyde Valley area shows Braehead's significance in the network ranking it the second most significant centre in Glasgow and the Clyde Valley. Nevertheless the SDP (CD/02) itself did not take a view on town centre status or otherwise.

It should also be noted that this assessment was undertaken on a definition of Braehead that was essentially the indoor centre. The Local Development Plan views Braehead as including the office developments that are a key component to Braehead as a broadly based generator of economic benefit to the Renfrew North area, and the Xscape leisure facilities which provide an important recreational function.

The SDP Main Issues Report Background Report 11 (CD/24) drew a conclusion that the most appropriate option is to recognise Braehead as an evolving town centre in a relationship with Paisley town centre, which fulfils a wider range of town centre functions and which has a distinctly different retail offer. This would allow the Local Development Plan to support investment in Braehead on the basis of the relationship with Paisley. This however was a decision that was not carried through to the SDP (CD/02) itself as explained to the SDP Examination (CD/25), and has been left to the LDP to implement.

This change from the stance of the previous Structure Plan allows the council to incorporate Braehead into the network of centres presented in the Local Development Plan. The council in seeking to maintain Braehead is concerned that its capacity to contribute to the Renfrewshire economy is being constrained by a planning policy status that does not allow it to compete with emerging retail pressures and maintain its levels of occupancy, attractiveness and employment.

The owners of Braehead share Renfrewshire Council's desire to see Braehead evolve from what was originally a shopping mall to a multi dimensional centre that is well connected to its surrounding communities, and to develop its character as a people focussed centre with new external public spaces and, through the incorporation of the Fastlink scheme, enhanced public transport connectivity. The regeneration of the Renfrew North area has slowed significantly. The first houses were completed in 2005/06 and it has taken seven years for 733 units to have been completed and occupied, leaving 65% of the anticipated new homes still to be built. Therefore the new community around the centre is still to fully emerge. Future development at Braehead afforded by the certainty given by town centre status will re-energise this regeneration. In doing so this investment will be a significant catalyst for the completion of the Renfrew North scheme.

The LDP has therefore defined a framework for a masterplan that focuses on this

continuing transformation of character. In doing so it is in exact reverse of Glasgow City council's strategies of grafting shopping malls on to existing small town centres in Pollock and Easterhouse. In Braehead the focus is on how people will move into, through and around the centre from its surrounding communities, from further afield using new public transport infrastructure and from established road connections. In this way Braehead's character will change whilst its town centre roles and functions as defined in the SPP (CD/03) are enhanced. Regardless of Braehead's town centre status new development proposals for Braehead must accord with this framework and those now submitted seek to do that.

Retail impacts

Glasgow City Council (204); West Dunbartonshire Council (1966); Inverclyde Council (1974); Buchanan Partnership (2084); St Enoch Centre Investors (1973); Retail Property Holdings (1972); NRR (Paisley) Ltd (2054); Co-operative Group (1977); PWCCC (345); David Dunlop (1976)

The demand context for any expansion of Braehead must be based upon robust and transparent evidence. This has not been provided at the Strategic Development Plan level. The only published assessment is Background Paper 14 (CD/23) produced for the SDP MIR (CD/22) in 2011 but this is not a capacity assessment. On this basis the framework for development set out in the LDP envisages the sites within the town centre that will accommodate expansion for both retail and commercial leisure but has not scaled these. As a town centre Renfrewshire is committed to seeing Braehead evolve and develop to continue to provide employment, retail and leisure facilities to Renfrewshire within a regionally competitive marketplace with the City Centre at the apex of the region's network of centres and other town centres based at motorway junctions at Silverburn and Glasgow Fort.

Braehead's current commercial centre status weakens its significance in consideration of the impacts of new retail and commercial leisure development elsewhere. Braehead is not immune to competition and its concentration of national high street multiples has made it vulnerable to wider retail trends. Furthermore its status makes it difficult for the centre to react to the pressures that would see it decline. As a demonstration of these pressures Background Paper (CD/26) shows the extents of consented schemes in centres across Glasgow and the Clyde Valley.

Detailed retail capacity evidence has been prepared in support of the current development proposals being considered by the council for Braehead (CD/18). The strategic test is the effect on the city centre and any proposals submitted must be judged against this. This assessment is being made in consideration of the submitted planning application, which will not be determined until the LDP process has been completed.

The LDP considers, as mentioned previously, Braehead's role as Renfrewshire's prime retail centre within its network of centres. The council's view for its other town centres is to provide diverse and distinct opportunities for them to flourish.

Precedent issue

Glasgow City Council (204)

Braehead has previously been recognised in the GCV area as distinct from other commercial centres. The Glasgow and Clyde Valley Joint Structure Plan 2000 Fourth Alteration 2008 (CD/17) identifies Braehead as the only commercial centre with a

shopping and commercial leisure function. Others are defined as tourism orientated or retail warehouse parks. Of these others none are now recognised by the Strategic Development Plan (CD/02) as Strategic Centres. There are therefore no other similar centres that should cause any concerns over precedent.

In any event the task of deciding whether a centre qualifies as a town centre is for the planning authority to undertake, as part of its preparation of the development plan in accordance with Scottish Planning Policy (CD/03). Any future case should be justified on its merits. Town centre status is not something which can be applied for by a developer, like planning permission.

Delivery of masterplan and current PPP application

Glasgow City Council (204); St Enoch Centre Investors (1973); Retail Property Holdings (1972); John Lewis plc (1797)

The still to be determined planning application (CD/18) is not being made to transform Braehead into a town centre, the council proposes in the Plan that it already merits this status as it displays the appropriate range of functions to be recognised as such.

Figure 12 of the LDP sets out the framework for a masterplan for Braehead. Its focus is explicitly on connectivity, accessibility and the public realm to be delivered through investment in Braehead's retail, commercial, business and residential functions. Delivery is a matter for the council to confirm through Development Management and any agreements required on the consenting of planning applications submitted within the area covered by Figure 12.

Town Centre boundary

Buchanan Partnership (2084); Braehead Properties Ltd (2078)

The council sets out in Figure 12 areas within the town centre boundary where it expects to see short and longer term town centre development. These areas integrate well with the core of the town centre and the accessibility network established within it. The council can see no justification to reallocate land identified for economic purposes to town centre uses. Development proposals for the land covered by Policy E3 could meet tests set out by that policy and in the new development Supplementary Guidance that might justify alternative development uses without the need to change the town centre boundary. This issue is also discussed within the schedule for Issue 4 Policy E3.

Titanium Business Park is included within the town centre as it is a significant office location that benefits from the centre's accessibility networks current and future. The offices provide additional support to the town centre as an employment location.

Supporting text – Centres, Clyde Riverside

Intu (1967)

Paragraphs 1 and 3 of the 'Clyde Riverside' sub-section of the 'Centres' section seek to confirm the point that Braehead functions as a town centre but its urban character is not that of a traditional town centre. The council and the land owners agree that this is an area that can be improved upon and the principles expressed in Figure 12 of the Plan set out the framework for that development, which are described in paragraph 4 as aiming to create a "a modern and exemplary town centre environment". This is stated quite clearly in

paragraph 3 and therefore it is suggested that, if the Reporter agrees, the final sentence of the first paragraph of this section is deleted.

Figure 12 Braehead

Intu (1967)

The council is happy with the description of the land uses in Figure 12. They reflect the current position or the future position without being overly prescriptive. The terminology 'Town Centre Expansion' gives flexibility in potential future uses.

Miscellaneous points

Points made by NRR (Paisley) Limited (2054) on the relationship between Paisley and Braehead are dealt with in the Schedule for Issue 6 – Policy C1.

Points made by Braehead Properties Ltd (2078) in relation to Policy E3 are dealt with in the Schedule for Issue 4 (Policy E3).

Reporter's conclusions:

A hearing session to discuss the matters raised in this Schedule 4 was held. The additional information given by parties before and during the hearing is briefly summarised below.

Renfrewshire Council

- Braehead is the second most significant retail location in the Glasgow and Clyde Valley area, second only to Glasgow city centre;
- It makes a substantial contribution to the local economy;
- Designation as a town centre will allow Braehead to continue to play a positive role, encouraging investment and sustainable economic growth;
- It is designated as a 'strategic centre' in the strategic development plan, alongside other town centres, such as Glasgow Fort (Easterhouse) and Silverburn (Pollok);
- It is the only strategic centre that is not also a town centre. This is a deterrent to investors, slowing the regeneration of the area;
- Town centre status would allow the owners of Braehead to implement a masterplan to create a more successful place;
- The Clyde Waterfront, of which Braehead is part, is identified as an issue of national importance in National Planning Framework 2 and also within the National Planning Framework 3 Main Issues Report;
- The strategic development plan relies on Braehead to help complete the regeneration of the Clyde Waterfront;
- Regeneration of the area has stalled – 64% of the 1,958 houses that are to be built in this area have still to be delivered;
- If Braehead does not have the same policy certainty as other locations with town centre status (which do not have national regeneration outcomes) its ability to attract investment will be significantly constrained, threatening the strategic development plan's spatial development strategy;
- Within the town centre boundary, as defined on the local development plan proposals map, there is a mix of uses, including retail, leisure, entertainment, recreation and business;

- This mix of uses has evolved beyond a commercial centre definition – Braehead functions as a town centre;
- Comparison retail is the dominant use, occupying 44% of the gross floorspace, 26% is leisure use;
- Linwood Phoenix and Abbotsinch are both examples of commercial centres – these centres do not offer the same mix of uses or accessibility and do not serve the same population as Braehead;
- Braehead has a level of accessibility that is similar to most town centres and the proposed positioning of the transport interchange at the centre will provide an even higher level of accessibility;
- The boundary of the town centre has been tightly defined and complementary uses within the wider area strengthen the vitality of the centre. Including the adjacent areas within the boundary would dilute the effectiveness of the place-making proposals intended to develop a town centre character;
- The roles and functions of Braehead and Paisley within Renfrewshire's Network of Centres are quite different and complementary. Paisley is unable to compete as a major retail centre and the development of Braehead has allowed Renfrewshire to retain retail expenditure within the area;
- Retailers require larger format units and Braehead is the best placed of all Renfrewshire's town centres to satisfy this demand in a sustainable and accessible location; and
- Investment at Braehead will create a strong positive identity for the centre with a variety of new economic opportunities and an improved physical environment.

Intu Properties (owners of the Braehead Centre)

- Intu Properties supports Renfrewshire Council's position;
- Other recent major retail developments in the greater Glasgow area (Glasgow Fort/Easterhouse and Silverburn/Pollok) have town centre designation. They are, therefore, first choice locations for new investment in preference to Braehead because of their planning certainty. They have attracted recent new investment;
- Although Braehead is designated a 'strategic centre' in the strategic development plan, this term is not recognised by Scottish Planning Policy and is not interchangeable with 'town centre';
- The owners have been unable to bring forward investment at Braehead because they do not wish to be in conflict with planning policy;
- There is significant scope for overlap between a town centre and a commercial centre as defined by Scottish Planning Policy;
- At Ravenscraig there is no centre at all but it is nevertheless designated a town centre. The development plan must be forward looking and can designate a town centre where one is proposed as well as where one already exists;
- At Braehead there is wide economic and social activity in day and evening, far more so than in many town centres, which become deserted after 6 pm;
- Braehead lies at the heart of a growing business and residential community which regards Braehead as its town centre;
- Braehead displays the characteristics which are described at paragraph 54 of Scottish Planning Policy as the key elements of successful town centres;
- The masterplan at Figure 12 of the proposed plan is a vision for Braehead town centre and its environs. It builds on the elements already in place and guides delivery of further complementary developments, with strong emphasis on improved connectivity and enhanced public realm;

- Braehead is already a major focus for the community, for example, 34 separate clubs use the curling centre;
- Each of the centres fulfils different but complementary roles. Intu does not see Paisley as a competing centre;
- Similarly retailers wishing to locate at Braehead would consider that centre alongside others such as Silverburn and Glasgow Fort;
- The council's strategy for the centres is to play to their strengths. In the case of Paisley, this means that it will be a focus for education, civic functions and specialist retailing, with a growing town centre population;
- Braehead will focus on its strategic higher order retail function, while broadening its business, leisure, employment and higher level community functions; and
- The regeneration required by the strategic development plan at Braehead relies on town centre designation. Only then would it be supported by national planning policy and the sequential approach to the location of new development.

Glasgow City Council

- Renfrewshire attracts almost half of its expenditure from neighbouring authorities (including 18% from Glasgow). Much of this is attributed to Braehead, which is already competing with Glasgow City Centre;
- Braehead's status has not been a significant constraint to its competitiveness to date;
- The health and well-being of Glasgow City Centre is a strategic issue as identified in the strategic development plan;
- Braehead is a retail/commercial leisure location and none of the public sector or civic uses which contribute to the sense of place in a town centre, such as are found at Easterhouse and Pollok, are present;
- Recent development at Braehead (the Xscape centre) has consolidated its role as a commercial leisure location;
- Any diversification of uses is outwith the proposed town centre boundary and would exaggerate the separation of the commercial centre from the community;
- The slower pace of development at Renfrew North has little connection to Braehead's status. It is more closely linked to the wider economic difficulties that have affected all parts of the country in relation to the housing market; and
- A planning application for retail and leisure expansion has already been submitted to Renfrewshire Council, which suggests that the current status of Braehead has little bearing on the willingness to invest at this location.

Inverclyde Council

- Renfrewshire Council's responses fail to provide sufficient evidence for the assertions made;
- Braehead is approximately 95% occupied, making it difficult to see why town centre status is required to attract investors; and
- The regeneration of Renfrewshire North/Clyde Waterfront is already well supported through identification in National Planning Framework 2 and 3 (Main Issues Report), and the approved Glasgow and Clyde Valley Strategic Development Plan. No convincing case is made as to how town centre status will increase its attraction for investors or further the regeneration of the wider area beyond extending the retail offer.

West Dunbartonshire Council

- The primary purpose of the town centre designation is to change and extend the retail offer;
- Braehead is included in the list of strategic centres identified by the strategic development plan because of its scale and its influence upon shopping patterns within the city-region. However, the strategic development plan does not suggest that Braehead should be designated as a town centre;
- Whilst the expansion of the Braehead Shopping Centre may be viewed as a catalyst for further renewal of Renfrew Riverside, as centres such as Clydebank and Dumbarton become comparatively less attractive, there is a consequence for their adjoining waterfront redevelopment opportunities; and
- Braehead Shopping Centre has had little regenerative effects beyond Renfrew Riverside. There is no evidence to suggest an expansion of the shopping centre would have wider regeneration benefits.

Retail centre owners and retailers in Glasgow city centre

- Town centre status would severely threaten the position of Glasgow City Centre and would lead to a detrimental change to the network of centres;
- Silverburn and The Fort were developed adjacent to existing town centres to regenerate those town centres;
- The proposed Braehead town centre has more than doubled in size in terms of commercial floorspace since 2005 and has added a major leisure facility (Xscape), a hotel (Travelodge) and additional retail floorspace without the benefit of a town centre designation;
- The residential development at Renfrew Riverside was making significant headway prior to the downturn in the Scottish economy from 2008;
- The proposed town centre boundary is predominantly driven by ownership rather than planning and place making reasons;
- The Titanium Business Park has little or no relationship to the centre;
- There is no need for town centre status for an improvement to the public realm at Braehead;
- Only 2% of users walk or cycle to Braehead, which is low in comparison to most town centres; and
- The council does not seem to have undertaken any evidence gathering on the likely impact on its existing town centres but instead states that they have complementary roles.

New River Retail (owners of the Piazza shopping centre in Paisley)

- It appears that the council wishes retail proposals at Braehead to be exempt from having to satisfy key policy tests such as the sequential approach to site selection and retail impact;
- The council acknowledges the significant impacts suffered by Paisley town centre as a result of Braehead, which is only 3.5 miles away;
- Vacant floorspace in Paisley town centre increased by 20.5% between 2008 and 2012 when there was a significant increase in retail and leisure floorspace at Braehead;
- Paisley has a vacancy rate of 22%, double the Scottish average;
- The dominance of Braehead is such that it does not require policy protection by

- having town centre status;
- In addition to the proposals at Braehead, there is an application to remove the sale of goods restrictions at the Abbotsinch retail park and such a restriction has already been removed at the Phoenix retail park; and
- There is very little protection for Paisley town centre and the designation of Braehead as a town centre would draw even more trade away from Paisley.

Reporter's conclusions

1. Traditional town centres have grown up to serve the surrounding community. They contain a mix of uses including retail, commercial, civic, leisure, healthcare and educational uses, with people making one trip to the town centre for a number of purposes. The high footfall resulting from the mix of uses means that all of these uses reinforce each other. Town centres are accessible on foot and by cyclists from surrounding residential areas. Many residents also live in town centres. Town centres are the focus for public transport routes. Although they are also accessible by car, it is usually necessary to ration car parking spaces by charging because, by their very nature, traditional town centres tend not to have large areas of land to devote to free car parks. Town centres are often the historic core of a settlement; many are conservation areas with numerous listed buildings. They are sometimes referred to as the 'heart' of the community.

2. Scottish Planning Policy describes town centres as having the following features: a diverse mix of uses and attributes; high level of accessibility; range and quality of shopping; wider economic and social activity in both the day and evening; integration with residential areas; and, quality of the environment. On the other hand, the policy points out that commercial centres generally have a more specific focus on retailing or on retail and leisure uses.

3. In my view, the area identified as the Braehead town centre in the proposed plan does not have a diverse mix of uses and attributes. There are no civic or educational uses and no houses in the centre. Although a number of community organisations use the leisure facilities at Braehead, I do not consider that this makes these facilities community facilities. Braehead's predominant uses are retailing and commercial leisure use. Although the Titanium business park is part of the town centre as defined in the proposed plan, it is a very small part in comparison to the retail and commercial leisure floorspace. Braehead is not integrated with residential areas and it does not have a high quality of environment. I acknowledge that it has a good range and quality of shopping and wider economic and social activity in the day and evening. It has very good accessibility by car, as it is near the M8 motorway and is surrounded by vast free car parks, and it also has good public transport accessibility by bus. It does not have good accessibility to the surrounding areas by foot or by bicycle, mainly because of the surrounding network of very busy multi-lane roads and the distance to most residential areas.

4. I acknowledge that, as Scottish Ministers stated when the Glasgow and Clyde Valley Structure Plan 2000 was approved in 2002, Braehead does perform certain town centre functions for the wider Riverside area. Shops and commercial leisure are facilities which a town centre is expected to provide. However, as I have pointed out above, there are other aspects to a successful town centre and these are not found at Braehead.

5. I accept the council's view that the Braehead centre (ie the area which is defined as a town centre in the proposed plan, including the covered shopping mall and the Xscape

leisure facility) is not the same as other commercial centres like the Abbotsinch or Phoenix retail parks. However, as Scottish Planning Policy points out, examples of commercial centres include out-of-centre shopping centres, commercial leisure developments, mixed retail and leisure developments, retail parks and factory outlet centres. In my view Braehead is a commercial centre of the mixed retail and leisure development type. I do not consider it to be a town centre. Instead, I consider the area to be a commercial centre located within the Glasgow conurbation, outwith any town centre.

6. It seems to me that the rationale for the sequential approach as explained in Scottish Planning Policy, stems from a recognition that traditional town centres find it very difficult to compete with out of centre modern shopping centres. There are many reasons for this, including a lack of suitable large sites for modern retailing in traditional town centres, multiple land ownerships, a lack of, or expensive, car parking facilities. At Braehead none of these shortcomings applies. As Scottish Planning Policy says, retail and leisure uses are fundamental to the concentration of other uses located in town centres. I believe this is why it is important to ensure that any proposals for expansion of retail and leisure floorspace in an out of centre location are undertaken in the full knowledge of their potential impact on the network of centres.

7. Braehead is the second most significant retail centre in the region in terms of expenditure, second only to Glasgow City Centre. The strategic development plan Main Issues Report Background Paper 11 – Retailing and the Network of Strategic Centres states that the centre dominates much of the west of Glasgow and the Clyde Valley, drawing expenditure from centres in Inverclyde, Renfrewshire, West Dunbartonshire and Glasgow. It points out that Braehead exhibits a dominance which challenges Glasgow in the west and which overwhelms Paisley. The paper notes that Braehead is not designated as a town centre but the scale of the commercial centre must be considered strategic.

8. The Glasgow and Clyde Valley Strategic Development Plan includes Braehead in its Network of Strategic Centres (Schedule 12 and Diagram 18). I note that it is the only strategic centre which is not also a town centre. Nevertheless, identification as a strategic centre in that plan must confer a higher status in the network and, therefore, in relation to the sequential approach than any other commercial centre in Renfrewshire's network of centres. In addition, the only other town centre in Renfrewshire which is a strategic centre in Schedule 12 and Diagram 18 of the strategic development plan is Paisley town centre. Consequently, in Figure 11 of the proposed plan the identification of Braehead alongside Paisley as a strategic centre at the top of the hierarchy of centres ahead of other town centres and service centres in Renfrewshire is appropriate, albeit 'strategic centre' is not a term referred to in Scottish Planning Policy.

9. Diagram 4 of the Glasgow and Clyde Valley Strategic Development Plan requires impact on Glasgow City Centre to be kept to an acceptable level and Strategy Support Measure 11 states that the long term health and wellbeing of the city centre is central to the Spatial Development Strategy and needs to be reflected in development management decisions. The proposed local development plan does not explain how the hierarchy identified in Renfrewshire's Network of Centres would relate to the city centre and the city is not referred to in policies C1 or C2. I accept that any proposal for retail development would also have to be assessed against the strategic development plan. Nevertheless, I do not consider that the proposed plan pays proper heed to the pre-eminence of the city centre in the Glasgow and Clyde Valley area.

10. I accept the view expressed by the owners of the Braehead centre that they do not see Paisley town centre as a competitor. But there is no denying that the development of Braehead and the decline of Paisley town centre have coincided, which I consider is more than happenstance. Renfrewshire Council considers that Paisley and Braehead (and other centres in the network) have a complementary role and I agree. In my view, Paisley town centre is the type of traditional centre which the approach advocated in Scottish Planning Policy is designed to protect.

11. In its response to the representations above, Renfrewshire Council states that it *“would not wish to see development in any one centre cause a detrimental impact on another”*. This is a laudable aim and one which I endorse. It is difficult to see how the council intends to achieve it, though, when town centre status at Braehead would mean that any proposals for retail expansion would avoid the need for a sequential approach or any analysis of retail impact on other centres in the Renfrewshire network.

12. In relation to retail impacts, the council acknowledges above that the demand context for any expansion of Braehead must be based on robust and transparent evidence. However, I have been provided with no evidence that the designation of Braehead as a town centre and the proposed areas for expansion identified on Figure 12 of the proposed plan have been based on any investigation into the qualitative and/or quantitative need for more retail space at Braehead. There does not appear to have been any consideration of either the possibility of accommodating that need in Glasgow city centre or any other town centre or of potential impact on the city centre or any other town centre. Furthermore, the council explains that the robust and transparent evidence that it acknowledges is needed was not provided at strategic development plan level and that the strategic development plan Background Report 14 ‘Network of Centres’ is not a capacity assessment. The council also explains that the framework for development at Braehead set out in the proposed plan envisages the sites that would accommodate expansion but has not scaled these.

13. The council also refers to detailed retail capacity evidence having been prepared in support of the current development proposals for expansion at Braehead which are being considered by the council. I note that this assessment concludes that Glasgow City Centre would continue to enjoy supremacy as the region’s principal shopping destination and that no other centres would face any undue pressure or difficulty as a result of those particular proposals. However, I am not aware that this assessment has been subject to any independent critical analysis.

14. I do not disagree that areas for potential expansion at Braehead should be identified on Figure 12, as I accept that the desirable improvements to the public realm and civic space at Braehead also identified in the figure would need to be funded in some way. However, the proposed plan should be clear that the proposals for expansion must be supported by evidence of qualitative and quantitative need for more retail space at Braehead and evidence of the sequential approach in relation to Glasgow City Centre and other strategic town centres.

15. I also consider that the objective that Braehead should develop a town centre character, as envisaged in the strategic development plan, should be supported. These elements of the narrative on pages 16 and 17, in Figure 11 and in Figure 12 of the proposed plan, should be retained despite my conclusions that the centre should not be identified as a town centre at this time.

16. I note that a town centre was identified at Ravenscraig in an Alteration to the Glasgow and the Clyde Valley Joint Structure Plan 2000 in the absence of any development on that site. The opinion in the 2006 House of Lords case produced by the Braehead Centre owners explains that, in its consideration of a planning application for retail development at Ravenscraig, North Lanarkshire Council consulted the structure plan Joint Committee, which contained representatives from all constituent planning authorities. The Joint Committee decided to seek approval of the Alteration which would add Ravenscraig to the network of town centres in the Glasgow and Clyde Valley area. Scottish Ministers duly approved the Alteration in 2003. The opinion explains that the Alteration would provide the strategic context for Ravenscraig's inclusion in the local plan.

17. The circumstances at Braehead are very different. In the Glasgow and Clyde Valley Strategic Development Plan 2012 Braehead was identified in Schedule 12 Network of Strategic Centres as a 'Commercial centre with retail, leisure, commercial, employment and business' not as a town centre. The strategic development plan Main Issues Report Background Report 11 (mentioned above) identified a number of issues for consideration. These included Braehead as a 'Strategic Spatial Issue' with 2 possibilities: Braehead as a strategic town centre or Braehead as a strategic commercial centre, in line with the established Metropolitan Development Strategy.

18. The strategic development plan included the latter rather than the former option. Braehead was not designated as a strategic town centre in that plan by the Glasgow and Clyde Valley Strategic Development Planning Authority, which contains representatives of the constituent councils, including those which made representations to this issue in the proposed plan (Glasgow City, Inverclyde and West Dunbartonshire Councils). This contrasts with the town centre at Ravenscraig, which was promoted as an Alteration to the structure plan by the structure plan Joint Committee, comprised of representatives of all the constituent planning authorities, as explained above. The structure plan Alteration was subsequently approved by Scottish Ministers.

19. There are other important differences between the town centre at Ravenscraig and the proposed Braehead town centre. The House of Lords Opinion referred to above quotes the 3 new paragraphs inserted in the structure plan by the Alteration. From these it is clear that the decision to include Ravenscraig as a new town centre depended on the following information:

- there was capacity for increased floorspace within the Motherwell and Wishaw retail catchment areas;
- there was a need to consider the quality and distinctiveness of the retail facilities;
- leisure and retailing floorspace would be combined with other town centre functions;
- there would be a link with the existing centres of Motherwell and Wishaw, where measures would be required to manage the impacts of the retail centre at Ravenscraig and this would be achieved by an agreement under section 75 of the Act;
- there required to be evaluation of the impact on other centres;
- the town centre at Ravenscraig would include retail floorspace and a range of other community facilities and services; and
- the development of any retail provision would be linked through programming to the phased development of a comprehensive redevelopment plan for the Ravenscraig area.

20. In contrast, in relation to the proposed town centre and expansion at Braehead:

- I have been provided with no independently assessed evidence on retail capacity, or of any assessment of impact on other centres;
- there is no evidence of any measures to manage potential impacts on Paisley or other centres; and
- I have no evidence that there would be any link between the proposed town centre and development in the wider Renfrew North area (see paragraph 28 below).

21. Renfrewshire Council and the Braehead centre owners have pointed out that Silverburn (Pollok) and Glasgow Fort (Easterhouse) both have town centre status. I agree that, superficially at least, these centres have a lot in common with Braehead. Most of the recent retail development in those locations comprises large modern covered shopping malls, just as at Braehead. However, they differ from Braehead in the much wider mix of uses they contain, albeit the civic and community uses are located outwith the covered parts of the town centres. I am not aware of the specific reasons why such large shopping malls were added to what must have been quite small traditional town centres originally. Nevertheless, I do not consider that their designation as town centres has to mean that Braehead should also be so designated.

22. The council and the centre owners have pointed out that proposals for expansion at other town centres, notably Silverburn/Pollok and The Fort/Easterhouse, have recently been approved. However, I have been provided with no evidence that retailers have rejected locating at Braehead in favour of these other centres. I also agree with those who point out that Braehead's lack of town centre status has not proved a barrier to its very successful development so far and I observed myself that the retail centre itself is almost fully occupied.

23. In any event, even if Braehead were not designated as a town centre in the proposed plan, expansion would not necessarily conflict with local and national planning policy. If Braehead were to remain a strategic commercial centre, as it is now, any planning application for expansion would be assessed against the policies in the local development plan, the New Development Supplementary Guidance, the strategic development plan and Scottish Planning Policy. Braehead would still be within the Renfrewshire Network of Centres as shown on Figure 11 of the proposed plan. This means any proposal would be assessed against Policy C1 in the proposed plan not Policy C2, which applies to development outwith the network of centres.

24. In the absence of town centre status at Braehead, there would, nevertheless, be support from Scottish Planning Policy for expansion at Braehead where no city or town centre or edge of centre sites were suitable or available and retail impact analysis revealed no significant adverse impact on the role and function of any other network centre and no unacceptable impact on Glasgow City Centre. I also consider that designation as a strategic centre in the strategic development plan and the proposed plan confers a certain status, as explained above: Braehead would arguably be sequentially preferable to all other town centres in Renfrewshire, except Paisley. Any expansion at Braehead could also bring the benefits of improved public realm, pedestrian accessibility and the transport interchange shown on the masterplan in Figure 12 of the proposed plan.

25. Furthermore, the requirement for the sequential approach and analysis of the retail impact means that there would be evidence to show no detrimental impact on any other network centre. On the other hand, town centre status at Braehead would mean decisions

on any proposals for expansion would be not be supported by any evidence on retail impact on other centres in the network or on availability of town centre or edge of centre sites elsewhere.

26. There is no doubt that the development of the Braehead shopping centre, Xscape, the adjoining retail warehouse park, the other business premises and the houses that have recently been constructed in the general area have had considerable regeneration and economic benefits. The continued regeneration of the Renfrew North area is supported by National Planning Framework 2 and the strategic development plan (as part of the Clyde Waterfront).

27. It is apparent that there remains a large area of undeveloped brownfield land in the wider Renfrew North area. However, I consider that the slowdown of housing completions in the area has more to do with the financial crisis in 2008 and the subsequent recession than the lack of town centre status at Braehead. The lack of progress on development sites has happened all over Scotland, not just in this area.

28. In any event, it is difficult to see how town centre status would make any difference to the development of the brownfield sites for housing. I have no evidence showing any kind of link between the Braehead centre and the other potential developments in the wider Renfrew North area. There appear to be no proposals for cross funding and no planning obligations or other commitments by the centre owners or any other parties in this regard. It is also the case that there appear to be signs of recovery in the development of housing sites near the Braehead centre and that these have occurred without town centre status. I also note that, although there are undeveloped brownfield sites in Renfrew North, the area identified as the town centre in the proposed plan does not contain any areas in need of regeneration, albeit the urban design of the centre could be improved.

29. Town centre designation and the consequent approval of retail expansion with no need for a sequential approach or retail impact analysis would obviously be beneficial to the owners of the centre. There would also be economic benefit in terms of the creation of jobs at Braehead, but this has to be balanced against the possible disbenefits and possible loss of jobs elsewhere if there are impacts on other centres. In any event, as explained above, expansion at Braehead in the absence of town centre status need not be contrary to the development plan, and I do not consider town centre status to be essential for such expansion.

30. Braehead Properties consider that the land identified as subject to policy E1, E3 and P1 on Old Govan Road should be included within the proposed Braehead town centre so that the centre has scope to evolve, expand and adapt. In Figure 12 the council has already identified areas within the Braehead centre for expansion, which I have explained above should be retained. Braehead Properties has provided no evidence that there is a demand context for even further expansion in addition to the areas identified on Figure 12 and no evidence on potential retail impact on other centres. In the report for Issue 4, it is recommended that the reference to retail uses being unacceptable in the policy E3 Transition Area on this site should be removed. Proposals for retail use on the site would, therefore, be dealt with in accordance with the policies in the proposed plan, the SDP and SPP. In any event, I have already concluded that Braehead should not be identified as a town centre and I see no need for expansion of the Braehead centre outwith the boundary identified in the proposed plan as the town centre boundary. I am also mindful of the rationale behind policies E1 – Renfrewshire’s Economic Investment Locations and E3 – Transition Areas. I consider it is important to retain the designation of these areas for the

reasons explained in the Economy section of the proposed plan at pages 8 – 14.

31. Questions have been raised about the inclusion of the Titanium Business Park within the proposed town centre boundary. However, Schedule 12 of the strategic development plan identifies the diversification of roles and function of Braehead centre as a challenge. Furthermore, the proposed plan in the narrative on page 16 and in Figure 11 also states that there is a need for Braehead to develop a town centre character. I consider that including the business uses within the centre boundary (although it would not be a town centre at this time) would go some way towards this aim.

32. I agree that the Travel Lodge to the west of Xscape should be identified on Figure 12 as 'existing hotel' rather than 'business/commercial use'. As I have concluded that Braehead should not be identified as a town centre, there is no need to add 'town centre' to the area identified as leisure use on Figure 12. Both the strategic development plan and the proposed plan identify the diversification of roles and function of Braehead centre as a challenge and that there is a need for Braehead to develop a town centre character. Consequently, I do not consider that the red areas identified for expansion on Figure 12 should be limited to retail expansion only.

33. I note that the council has agreed with the Braehead Centre owners that the last sentence of the first paragraph of the section under Clyde Riverside should be deleted. However, in my view, Braehead does indeed have the character of a shopping mall rather than a town centre at present. Furthermore, I do not consider that the other paragraphs in this section refer to this issue in the context of any proposals for further development of the centre in the future. Consequently, in my recommendation on this paragraph below I have retained this sentence.

Reporter's recommendations

The plan should be modified as follows:

1. In the narrative on page 16:

(a) under Strategic Centres, on the second line delete "Town"

(b) under Clyde Riverside – Braehead, Renfrew, Erskine, Bishopton, replace the first paragraph with the following:

"Braehead is identified in both the SDP and the LDP as a Strategic Centre. The SDP seeks the development of a masterplan for the regeneration of the centre and wider area as Braehead is central to the Clyde Waterfront regeneration initiative and the emerging community of Renfrew North. The council may allow further retail development at Braehead but the LDP will only support such expansion where it furthers the development of a town centre character at Braehead, where there is evidence of a qualitative or quantitative need and if there are no suitable sites in Glasgow City Centre or Paisley town centre. There is a need for Braehead as a place to develop a town centre rather than shopping mall character and this must have a bearing on all proposals that emerge in the future."

(c) under Clyde Riverside – Braehead, Renfrew, Erskine, Bishopton, in the fourth paragraph replace the final sentence with the following:

“There is a need for Braehead to develop the character of a town centre.”

2. In the narrative on page 17, under Retail Warehouse Parks (to be changed to Commercial Centres) – Linwood, Phoenix, Abbotsinch Retail Park, Braehead Retail Park, in the second paragraph, second line, insert “Centres” after “Strategic”.

3. In Figure 11 – Renfrewshire Network of Centres Role & Function:

(a) under “Strategic Centres” after “Braehead”, delete “Town Centre”

(b) under “Strategic Centres” in the third column “Challenges/Opportunities”, against “Braehead” replace the existing paragraph with the following:

“To develop a town centre character, creating a sense of place and increasing connectivity between Braehead and Renfrew while developing a hub for public transport. Significant opportunity for development of town centre uses that will continue to stimulate and complete the wider Clyde Waterfront regeneration, subject to the sequential approach and acceptable retail impact in relation to Glasgow City Centre and Paisley Town Centre.”

(c) under “Retail Warehouse Parks” (to be changed to “Commercial Centres”) in the third column “Challenges/Opportunities” against “Braehead Retail Park”, in the first line delete “Town” and replace with “Strategic”.

4. In Figure 12 – Braehead, in the Key:

(a) in Proposed Town Centre Expansion, Long Term Town Centre Expansion and Town Centre Boundary, delete “Town” and replace with “Strategic”.

(b) against both Proposed Strategic Centre Expansion, Long Term Strategic Centre Expansion insert and asterisk.

(c) at the foot of the Key insert an asterisk against which add “subject to the sequential approach and satisfactory retail impact in relation to Glasgow City Centre and Paisley Town Centre”.

5. In Figure 12 – Braehead:

(a) in the location of the Travel Lodge, replace the purple “Business/Commercial Use” shading with a different colour to indicate the existing hotel use and add this colour and the appropriate label to the Key.

6. In Policy C1 add at the end of the policy:

“and bearing in mind the pre-eminence of Glasgow City Centre as identified in the Glasgow and Clyde Valley Strategic Development Plan Strategy Support Measure 11”.

7. In Policy C2:

- (a) replace the first bullet point with the following:

“Provide clear justification as to why sites within the network of centre and Glasgow City Centre have been discounted, demonstrating a sequential approach has been undertaken to site selection”.

- (b) add at the end of the second bullet point:

“and Glasgow City Centre”.

- (c) add at the end of the fourth bullet point:

“or Glasgow City Centre”.

Issue 9	Policy I1 - Connecting Places	
Development plan reference:	Policy I1 - Connecting Places	Reporter: Karen Heywood
Body or person(s) submitting a representation raising the issue (including reference number):		
Railway Paths Limited (91) Paisley West and Central Community Council (345)		
Provision of the development plan to which the issue relates:	Policy I1 sets out the priority that is to be given to sustainable modes of transport to ensure that new development is located in appropriate locations and maximises opportunities for the use of public transport and active travel networks.	
Planning authority's summary of the representation(s):		
<u>Railway Paths Limited (91)</u> The last sentence of Policy I1 would not allow the blocking of local roads to encourage cycle/pedestrian use for short journeys or reallocation of highway space to enlarge cycle provision at the expense of motorised traffic. <u>Paisley West and Central Community Council (345)</u> More emphasis should be placed on use of the car, in addition to that which is placed on public transport.		
Modifications sought by those submitting representations:		
Suggests omission of the word "local" from the last sentence of Policy I1. (91) None suggested. (345)		
Summary of responses (including reasons) by planning authority:		
<u>Railway Paths Limited (91)</u> Policy I1 in the proposed Local Development Plan (LDP) supports a shift towards sustainable modes of transport and linking development to walking and cycling routes. The policy aims to ensure walking and cycling are priorities in the hierarchy of movement by supporting and encouraging new development to locate beside existing active travel routes. Within Renfrewshire many of the existing core paths and sections of existing cycle routes are on or beside existing local roads and this operates well without the need to block up local roads to allow		

pedestrian or cycle access. The last sentence within Policy I1, is in compliance with Scottish Planning Policy (SPP) (CD/03) ensures new development does not have an adverse effect on existing infrastructure and it continues to work efficiently.

Paisley West and Central Community Council (345)

Policy I1 serves to promote sustainable modes of transport in line with SPP (CD/03), “this means a shift from car-based travel to walking, cycling and public transport.” The greater emphasis that is placed on public transport is in line with SPP (CD/03) that details the priority which sustainable modes of travel should be given to reduce greenhouse gas emissions from transport. On this basis it is rejected that more emphasis should be placed on the use of the car.

Reporter’s conclusions:

Railway Paths Limited

1. Policy I1 – Connecting Places is intended to support a shift towards walking, cycling and public transport. At the same time it also recognises that access by car is important and that development proposals should have no significant impact on the local and trunk road network. Any proposal to close off a local road to provide for footpath and cycle access would be assessed against this policy, which does not necessarily mean that it would not be allowed. The key phrase is “significant impact”. A proposal could have an impact but this impact could be judged to be not significant. I see no reason why the last sentence of the policy should be removed.

Paisley West and Central Community Council

2. I agree with the council that policy I1 is in line with Scottish Planning Policy, which supports a shift away from car-based travel and towards walking, cycling and public transport. However, the last sentence of the policy will ensure that proposals for development have no significant impact on the local and trunk road network. Any proposal would also be assessed against the criteria in the New Development Supplementary Guidance, which ensures that the impacts of vehicular traffic are properly assessed and appropriate facilities are provided. I do not consider that more emphasis should be placed on car travel.

Reporter’s recommendations:

No modifications.

Issue 10	Policy I3 Potential Transport Improvements	
Development plan reference:	Policy I3 Potential Transport Improvements	Reporter: Karen Heywood
Body or person(s) submitting a representation raising the issue (including reference number):		
Strathclyde Partnership for Transport (SPT) (9) Glasgow City Council (204) Paisley West and Central Community Council (345) Elderslie Community Council (2059) Paisley and Gryffe Transport Forum (2060) Glasgow Airport Limited (2064)		
Provision of the development plan to which the issue relates:	To ensure land is safeguarded to allow support for the implementation of sustainable modes of transport.	
Planning authority's summary of the representation(s):		
<p><u>SPT (9)</u></p> <p>Figure 8 includes a public transport enhancement corridor south of, but not including, the airport road system and SPT supports road enhancements for public transport. Some public transport solutions may include other routes to the airport and this could be referenced in text. The outputs from the current study led by Glasgow Airport Limited and Transport Scotland should also be referenced in this diagram and it is understood that solutions identified from this study are not narrowly focused.</p> <p>Figure 8 includes an indicative road link between Inchinnan Road and Renfrew Road. SPT is not aware of the transport demand or development need for this link bridge and would suggest that a STAG assessment should be taken forward to understand the issues and whether this is the best solution to meet the Council's objectives for this area.</p> <p><u>Glasgow City Council (204)</u></p> <p>The Programme of Delivery includes an action to 'Assist with the preparation of strategies and plans to improve surface access to and from Glasgow Airport'. Glasgow City Council considers that the LDP should protect the alignment previously identified for construction of the Glasgow Airport Rail Link, until such time as an alternative route for a surface transport link to Glasgow Airport has been identified and committed for implementation.</p> <p><u>Paisley West and Central Community Council (345)</u></p> <p>Although there is an emphasis on the east/west development through Braehead and Ferry Village, connections across the Clyde offering north/south travel are not considered. Also would like to see specific proposals to support travel through and around Paisley.</p> <p><u>Elderslie Community Council (2059)</u></p>		

Would like to see the re-opening of Elderslie Rail Halt included within the plan. Reinstatement of the line from Paisley Canal to Elderslie has been put forward in the Strategic Transport Projects Review (CD/28). Inclusion of this rail halt proposal would acknowledge this and increase the chances that the station would re-open as a part of this national infrastructure project.

Paisley and Gryffe Transport Forum (2060)

Areas of disused railway trackbed should be safeguarded in the hope that they may be reopened in the future. Specifically railway infrastructure from Arkleston to Paisley Harbour, Wallneuk and Brookfield should be safeguarded. Provision should be made in Brookfield for a future railway station.

Glasgow Airport Limited (2064)

It is considered that the potential surface access enhancements at and around Glasgow airport should be included within Policy I3.

Modifications sought by those submitting representations:

Reference could be made within the text and Diagram 8 to alternative public transport routes to the airport as well as the outputs of the current study led by Glasgow Airport Limited and Transport Scotland.(9)

The wording of Policy I3 should be amended to reflect the safeguarding of the alignment for the Glasgow Airport Rail Link, and this alignment should also be identified on the Proposals Map. (204)

Page 24, Policy I3, we would suggest that an additional bullet point under 'Potential Transport Improvements', be inserted to read "Surface access enhancements at Glasgow Airport". (2064)

None Suggested. (345, 2059 and 2060)

Summary of responses (including reasons) by planning authority:

Public Transport to Glasgow Airport (9)

Public transport access solutions to Glasgow Airport are explicitly supported under Policy E5 of the proposed Local Development Plan (LDP). The programme of delivery in the proposed LDP and LDP Action Programme (CD/01) also make specific reference to supporting investigations into improving these transport connections. It is rejected that reference should be made to the study undertaken by Glasgow Airport Limited and Transport Scotland. While the preparation of this study, ongoing work and the development of future proposals are supported by the council, it is not appropriate to support the outcomes of a particular study prior to an approach being agreed by the council and its partners.

Inchinnan Road and Renfrew Road Link (9)

SPT's comments are noted. It is acknowledged that a Strategic Transport Appraisal

Guidance (STAG) assessment would be required to gain an understanding of the transport needs in this area. The implementation of the Renfrew Northern Distributor Road is an action within the LDP Action Programme (CD/01) and the understanding of the transport needs will be considered as this action progresses.

Glasgow City Council (204)

The Glasgow Airport Rail Link is no longer supported by the Scottish Government or Transport Scotland. While the council will support and assist with the preparation of an alternative solution, it is not considered appropriate to set aside land for this project which is not expected to go ahead.

Paisley West and Central Community Council (345)

Policy I3 in the proposed LDP supports proposals for transport enhancement by safeguarding land that is required for their delivery. These include enhanced pedestrian, cycle and vehicular networks within Paisley Town Centre as indicated on the proposals map and illustrated in Figure 13. The proposals set out under Policy I3 reflect priorities identified nationally and strategically, such as the Fastlink or the shift towards making public transport more competitive against the car by improving park and ride facilities. No proposals for additional connections across the Clyde have been submitted to the council for consideration. Any such crossing would be of national or strategic importance and would have been identified as such. Any such proposal would not be delivered within the plan period without support identified at a national or strategic level. It is therefore not considered appropriate to consider further north/south connections across the Clyde.

Elderslie Community Council (2059)

It is acknowledged that the reinstatement of the line from Elderslie to Paisley Canal has been identified in the 2009 Strategic Transport Projects Review (STPR) (CD/28) as part of Intervention 26. The timeframe for investigating the implementation of this intervention was confirmed by Transport Scotland to be in the medium to long term. Scotland's Route Utilisation Strategy Generation Two (2011) (CD/29), published by Network Rail, the rail industry's plan for Scotland for the period 2014 – 2019, does not indicate any works in association with the Elderslie to Paisley Canal line in the short term and this is the reason for this intervention not being added into the list of potential transport improvements under Policy I3. The projects listed within I3 are expected to be investigated and/or implemented within the lifetime of the plan. Transport Scotland made no comment in their consultation that this intervention requires to be specifically identified in this LDP. In the preparation of each LDP, this transport intervention will be considered. In the meantime the route will remain a core path and important part of Renfrewshire's green network.

Paisley and Gryffe Transport Forum (2060)

Policy I3 in the proposed LDP sets out the council's intention to support specific proposals which have been identified to be brought forward in the lifetime of the LDP. In these circumstances land has been safeguarded so as to facilitate the delivery of these specific proposals. At this time there are no proposals for any of the areas of disused trackbed which have been mentioned by the respondents. It is not therefore appropriate to safeguard these areas. Policy I3 will support alternative transport improvements should they be required to facilitate new development, but because specific details of proposals have not been presented these have not been included within the proposed LDP.

Glasgow Airport Limited (2064)

It is considered that the potential transport improvements require to be added to the list of potential transport improvements within Policy I3. If the Reporter is so minded an additional bullet point should be added to Policy I3 to read:

- *“Surface access enhancements at Glasgow Airport”*

Reporter’s conclusions:

Public Transport to Glasgow Airport

1. Policy E5 Glasgow Airport Operational Land on page 14 of the proposed plan states a presumption in favour of uses associated with the airport. This includes *“land required to improve surface access arrangements, including sustainable transport and travel”*. The programme of delivery in the proposed plan and the Action Programme also refer to supporting investigations into improving these transport connections. There is, therefore, no need to alter Figure 8.

2. I note that the study undertaken by Glasgow Airport Limited and Transport Scotland, while it is supported by the council, has not yet been agreed by the council and its partners. In these circumstances, I agree that it would not be appropriate to make specific reference to it in the proposed plan.

Inchinnan Road and Renfrew Road Link

3. The potential road link between Inchinnan Road and Renfrew Road is noted on Figure 8 as “Indicative”. However, I consider it would be sensible to add a reference to the need for a Strategic Transport Appraisal Guidance (STAG) assessment to the key on Figure 8 so that expectations are not raised unrealistically.

Glasgow City Council

4. I agree with the Renfrewshire Council that, as the Glasgow Airport Rail Link is no longer supported by the Scottish Government or Transport Scotland and the project is not committed, it is not appropriate to set aside land for it.

Paisley West and Central Community Council

5. Policy I3 – Potential Transport Improvements supports proposals for transport enhancement, including enhanced pedestrian, cycle and vehicular networks within Paisley Town Centre. These are also indicated on the proposals map and illustrated in Figure 13 on page 20 of the proposed plan. The concerns expressed by the community council about poor connections through Paisley are, therefore, acknowledged in the proposed plan.

6. As for the community council’s suggestion about transport links to the north, I note that the proposals referred to in Policy I3 reflect priorities identified nationally and strategically. No proposals for additional connections across the Clyde have been submitted to the council for consideration. I agree that any such proposal would be of national or strategic importance and that it would not be delivered within the plan period

without support identified at a national or strategic level. I agree with the council that it is not appropriate to set aside land for a project which is not committed.

Elderslie Community Council

7. I appreciate that Policy I3 safeguards land for a number of projects that are expected to be investigated or completed during the lifetime of the proposed plan. I agree that it would not be appropriate to include the reinstatement of the line from Elderslie to Paisley Canal as a project in this policy, as it is intended to be implemented in the medium to long term and not within the proposed plan's lifetime. I note, too, that Transport Scotland made no comment in their consultation that this intervention requires to be identified in the proposed plan.

8. However, the reinstatement of the line has been identified in the 2009 Strategic Transport Projects Review as part of Intervention 26. The project does, therefore, have a certain status and it may well be implemented eventually. For this reason I consider it should be mentioned somewhere in the text of the Infrastructure section of the proposed plan on pages 22 and 23 so that people are aware of the possibility.

Paisley and Gryffe Transport Forum

9. I have already decided that the possibility of the reinstatement of the line from Elderslie to Paisley Canal, although it should not be included as a project in Policy I3, should be mentioned in the text in the Infrastructure section of the proposed plan (see above). At this time there are no proposals for any of the other areas of disused trackbed mentioned. Therefore, I agree with the council that it is not appropriate to safeguard these areas.

Glasgow Airport Limited

10. The council has agreed to the request that "Surface access enhancements at Glasgow Airport" should be added to the bullet points identifying the potential transport improvement projects in Policy I3. I see no reason to disagree.

Reporter's recommendations:

1. On page 12 of the proposed plan, in the key at the bottom right hand corner of Figure 8, add after "3 Indicative road link between Inchinnan Road and Renfrew Road" the following in brackets:

(subject to a Strategic Transport Appraisal Guidance (STAG) assessment).

2. The possibility of the reinstatement of the line from Elderslie to Paisley Canal and its identification as a project in the in the text of the 2009 Strategic Transport Projects Review should be mentioned in the text of the Infrastructure section of the proposed plan on pages 22 or 23.

3. An additional bullet point should be added to Policy I3 to read:

Surface access enhancements at Glasgow Airport.

Issue 11	Policy I4 - Fastlink	
Development plan reference:	Policy I4 – Fastlink (Page 24)	Reporter: Karen Heywood
Body or person(s) submitting a representation raising the issue (including reference number):		
Strathclyde Partnership for Transport (SPT) (9) Glasgow City Council (204) Paisley West and Central Community Council (345) Intu Properties plc (1967)		
Provision of the development plan to which the issue relates:	Seeks contributions for Clyde Fastlink	
Planning authority's summary of the representation(s):		
<u>Strathclyde Partnership for Transport (9)</u> Welcome the inclusion of a specific developer contribution policy for Fastlink. Figure 7 defines 'Airport Surface Access Enhancements' within a very narrow area around the internal airport road system and M8 Junction 28. Improved public transport will help to address surface access issues and this could involve a range of initiatives. There is a reference to considering Fastlink service to the airport, however this opportunity is not demonstrated on Figure 7 which is focused on the narrow area of the motorway junction and the internal road system. <u>Glasgow City Council (204)</u> The policy is welcomed, however it is considered that contributions associated with a dedicated development contributions policy would be unlikely to deliver the Fastlink scheme on their own. The lack of mechanism to deliver Fastlink calls into question the ability of Renfrewshire Council to develop a sustainable location at Braehead and the decision to recognise Braehead as a town centre in the LDP. <u>Paisley West & Central Community Council (345)</u> Fastlink is emphasised, however the use of regular bus-lanes may possibly be delivered more quickly and less expensively. <u>Intu Properties plc (1967)</u> Policy I4 seeks contributions from developers whose applications would benefit from the Fastlink route. Page 14 of the New Development SG (CD/09) states that the amount of financial contribution required may be reduced where the developer is contributing land to allow the implementation of Fastlink. Consequently Policy I4 requires to be altered to reflect the principle outlined in the New Development SG (CD/09).		

Modifications sought by those submitting representations:
<p>Changes to Figure 7 as described above. (9)</p> <p>No modifications suggested. (204), (345)</p> <p>The first sentence of Policy I4 should read: 'The council will seek contributions from developers, and / or provision of land / essential infrastructure to at least the same value as the required contributions, where applications that would benefit from the Clyde Fastlink route are proposed.' (1967)</p>
Summary of responses (including reasons) by planning authority:
<p><u>Strathclyde Partnership for Transport (9)</u></p> <p>Support for Policy I4 is noted and welcomed.</p> <p>The spatial diagrams are to show how the policies and guidance within the proposed LDP will help deliver the future development framework for Renfrewshire. It is agreed that the airport surface access enhancements as shown in Figure 7 should be widened to take account of possible Fastlink access or connection to the Fastlink route to/from the airport. If the Reporter is so minded, Figure 7 should be altered to take account of potential future aspirations for Fastlink.</p> <p><u>Glasgow City Council (204)</u></p> <p>Renfrewshire Council have been working in partnership with SPT (project sponsors) and Glasgow City Council (project managers) on progressing both the core Fastlink route (Glasgow City Centre to the New South Glasgow Hospital campus) along with the extension to Renfrew. This process is being managed through a Project Steering Group where all three councils are represented. A Memorandum of Understanding for the delivery of the Fastlink core scheme has been signed by SPT and both Glasgow City Council and Renfrewshire Council. There has been on-going discussions regarding the connection of the Fastlink route between Glasgow and Renfrewshire and there is agreement as to how this connection can be achieved. Funding has been received from SPT for the design works for implementing the route and this is progressing with a coordinated approach with partners as well as landowners and those with a commercial interest surrounding the route.</p> <p>A large section of the Fastlink route from the boundary of Glasgow to the current end point of the route at Renfrew does not require major infrastructure interventions. There is a requirement for implementation of infrastructure at an area in front of Braehead and a segregated section of the route at the edge of the Renfrewshire boundary and into Glasgow City. The council does recognise that there is significant work required within Glasgow City boundary to link the route from the New South Glasgow Hospital to Renfrewshire and that this will require coordinated partnership which the council is firmly committed to.</p> <p>Delivery of sustainable transport to Braehead and Renfrew includes a commitment from the owners of Braehead to provide a segregated priority corridor in front of Braehead with Fastlink halts and associated infrastructure as part of the new improved transport facilities serving Braehead. Furthermore other developers in the vicinity of the Fastlink route have</p>

already signed legal agreements in association with planning consent to contribute to the implementation of Fastlink. The developer contribution policy will bring in additional funding for various alterations to junctions, traffic signals, bus stops and other requirements for successful implementation. It is recognised that the implementation of Fastlink cannot be funded through the contributions received from Policy I4 only. SPT have indicated however that they will support the implementation of Fastlink through their capital programme. Renfrewshire will work closely with SPT on this. Given the delivery mechanism in the proposed LDP and the specific action within the LDP Action Programme (CD/01) to work in partnership to identify sufficient funding to deliver Fastlink, we would disagree with Glasgow City Council's opinion on our ability to support delivery of an extension to the Fastlink scheme. The decision to recognise Braehead as a town centre within the proposed LDP is not based solely on the implementation of Fastlink. This issue regarding town centre status for Braehead is covered extensively in Issue 8.

Paisley West & Central Community Council (345)

The Fastlink scheme to be delivered within Renfrewshire can be accommodated to a large extent on the existing road network with small sections of the route segregated at Braehead and further east. The scheme will require the demarcation of bus lanes along Kings Inch Road as well as some works to accommodate and prioritise buses at junctions along with the implementation of new Fastlink halts, however it is anticipated that the scheme could be implemented in the lifetime of the plan.

Intu Properties plc (1967)

We do not consider it necessary to alter Policy I4 given the wording states that the council will 'seek' contributions. Furthermore the last line of the policy also states that the New Development Supplementary Guidance (SG) (CD/09) details the level of contribution required. The policies in the proposed LDP are considered to be high level statements with the details of the implementation of the policy, where it should and should not be applied, correctly set out in detail in the New Development SG (CD/09). No alteration to the policy required.

Reporter's conclusions:

Strathclyde Partnership for Transport

1. The council agrees that that the airport surface access enhancements as shown in Figure 7 should be widened to take account of possible Fastlink access or connection to the Fastlink route to/from the airport and proposes to alter Figure 7 accordingly. I see no reason to disagree.
2. The support for Policy I4 is not an unresolved representation to the proposed plan.

Glasgow City Council

3. It is clear from Renfrewshire Council's response that they recognise that the implementation of Fastlink cannot be funded through the contributions received from Policy I4 alone. They envisage that the developer contribution policy will bring in additional funding for various alterations to junctions, traffic signals, bus stops and other requirements for successful implementation. However, SPT has indicated that the implementation of Fastlink will also be supported through its capital programme. The

Local Development Plan Action Programme states that the council will work in partnership to identify sufficient funding to deliver Fastlink. There is, therefore, no need to alter the policy or to remove it from the proposed plan.

4. I accept Renfrewshire Council's explanation that the implementation of Fastlink was not the only reason for its decision to recognise Braehead as a town centre within the proposed plan. The concerns expressed about the town centre status for Braehead are covered in Issue 8.

Paisley West & Central Community Council

5. I note the council's explanation of how the Fastlink scheme will be delivered within Renfrewshire and that it can be implemented in the lifetime of the proposed plan. There is no need to make any alteration to policy I4.

Intu Properties plc

6. I note the council's explanation at the beginning of the form for making representations that the proposed plan is in two parts: the local development plan document and the New Development Supplementary Guidance. The council explains that together these documents set out the overall spatial strategy that will facilitate investment and guide the future use of land in Renfrewshire.

7. In addition, as the council points out above, Policy I4 states that the council will 'seek' contributions and that the New Development Supplementary Guidance details the level of contribution required. The guidance also recognises that the amount of financial contribution required may be reduced where the developer is contributing land to allow implementation of Fastlink. In these circumstances, I agree with the council that no alteration to the policy is required.

Reporter's recommendations:

1. The airport surface access enhancements shown in Figure 7 should be widened to take account of possible Fastlink access or connection to the Fastlink route to/from the airport and Figure 7 should be altered accordingly.

Issue 12	Policy I5 - Flooding and Drainage	
Development plan reference:	Policy I5 - Flooding and Drainage	Reporter: Ron Jackson
Body or person(s) submitting a representation raising the issue (including reference number):		
RSPB Scotland (183) SEPA (2108)		
Provision of the development plan to which the issue relates:	Policy I5 sets out the Council's promotion of sustainable flood risk management.	
Planning authority's summary of the representation(s):		
<u>RSPB Scotland (183)</u> Agree with the principles of Policy I5, however wish to see reference to managing the strategic flood risk of the Clyde. Would wish the potential for managed realignment as a tool for reducing estuarine flood risk and promoting habitat creation to be examined.		
<u>SEPA (2108)</u> Policy I5 should include a reference to connection to the public sewer (as defined in the Sewerage (Scotland) Act 1968) (CD/30) for all new development proposals as well as developments being supported by an assessment of flood risk where necessary. Policy I5 should also refer to avoidance as being the cornerstone of sustainable flood risk management.		
Modifications sought by those submitting representations:		
Suggest the following wording be added to the policy: 'Schemes which promote the sustainable management of riparian and estuarine flooding will be received favourably.' (183) Recommend the following wording 'Connection to the public sewer for all new development proposals either in settlements identified in the plan with a population equivalent of more than 2000 or wherever single developments of greater than 25 houses and large scale business and industrial units are proposed. In all other cases a connection to the public sewer will be required, unless the applicant can demonstrate that the development is unable to connect to public sewer for technical or economic reasons, and that the proposal is not likely to result in or add to significant environmental or health problems.' (2108) Recommend following wording 'Avoidance is the cornerstone of sustainable flood risk management.' As well as 'Developments being supported by an assessment of flood risk when deemed necessary.' (2108)		

Summary of responses (including reasons) by planning authority:

RSPB Scotland (183)

The support for the principle of Policy I5 in the proposed Local Development Plan (LDP) is welcomed. It is considered that the sustainable flood management is a requirement of all developments. The proposed additional wording would change the emphasis to suggest that compliance is not a requirement of all developments. Any development in close proximity to the Clyde is assessed in accordance with the risk posed from flooding and the principle of avoidance will be applied in the first instance. However if a technical solution, through sustainable flood risk management is provided by the developer then this would require to be assessed through other policies in the LDP, such as Policy P7 Green Network and Policy ENV4 The Water Environment. It is considered that the promotion of habitat creation and conditions to encourage species movement as set out requires to be considered for any development. The addition of the suggested wording is unacceptable and not required.

SEPA (2108)

SEPA's suggested modification to Policy I5 is accepted. Should the reporter be minded to, we propose that the policy could be reworded:

'New development will require to demonstrate that it will promote sustainable flood risk management measures by implementing suitable drainage infrastructure. Development must not have an impact on existing drainage infrastructure or increase the risk of flooding. Connections to the public sewer will be required for all developments where this is not already provided. Where any development involves land raising, effective compensation for any loss of local flood storage capacity must be secured. The implementation of new or improved drainage requires to employ Sustainable Urban Drainage Systems (SUDS) measures and flooding and drainage measures should aim to have a positive effect on the water environment as well as the natural heritage interests of the site or land surrounding the site. Any development will require to be assessed against the criteria and guidance set out in the New Development SG and be supported by an assessment of flood risk when deemed necessary'

We would request that the Reporter also notes that it is also proposed that the following addition be made to the New Development Supplementary Guidance page 24 (CD/09):

'Connection to the public sewer as defined in the Sewerage (Scotland) Act 1968 is required for all new development proposals:

• either in settlements identified in the plan with a population equivalent of more than 2000; or

• wherever single developments of 25 or more dwellings (or equivalent) are proposed.

In all other cases a connection to the public sewer will be required, unless the applicant can demonstrate that:

1. the development is unable to connect to a public sewer for technical or economic reasons; and

2. the proposal is not likely to result in or add to significant environmental or health problems.'

Reporter's conclusions:
<p><u>RSPB Scotland</u></p> <p>1. Policy I5 requires new development to demonstrate that it will promote sustainable flood risk management measures. Development must not have an impact upon existing drainage infrastructure or increase the risk of flooding. This requirement seems to me to be eminently sensible and it is supported by SEPA. The modification suggested by RSPB Scotland would be inconsistent with this provision and is therefore unacceptable.</p> <p><u>SEPA</u></p> <p>2. I note that the council is prepared to accept the thrust of SEPA's proposed modification and has suggested modifying Policy I5 and the New Development Supplementary Guidance to address SEPA's concerns. Although modification of the council's guidance is matter for them, I am satisfied that the proposed modifications to the guidance address the legitimate concerns raised by SEPA.</p> <p>3. Part of the council's suggested modification to Policy I5 would require connections to the public sewer for all developments where this is not already provided. This is inconsistent with the council's proposed guidance and does not allow for any exceptions. It is therefore inappropriate. I am content with the remainder of the proposed modification to Policy I5.</p>
Reporter's recommendations:
<p>I recommend that the following modifications be made:</p> <p>Amend Policy I5 by (1) deleting the words "will require to demonstrate that it will promote" and substituting the words "should avoid areas susceptible to flooding and is required to demonstrate promotion of" and (2) adding the words "and be supported by an assessment of flood risk when deemed necessary" after the words "New Development SG".</p>

Issue 13	Policy I6 - Renewable and Low Carbon Energy Developments	
Development plan reference:	Policy I6 - Renewable and Low Carbon Energy Developments	Reporter: Ron Jackson
Body or person(s) submitting a representation raising the issue (including reference number):		
Royal Society for Protection of Birds (RSPB) Scotland (183) Scottish Natural Heritage (SNH) (226) SportScotland (379) Scottish Renewables (1865) Scottish Environmental Protection Agency (SEPA) (2108)		
Provision of the development plan to which the issue relates:	Policy I6 indicates that support will be given for renewable developments and details criteria under which they will be considered.	
Planning authority's summary of the representation(s):		
<u>RSPB Scotland (183)</u> Support the policy in conjunction with supplementary guidance. <u>SNH (226)</u> Consider this policy to be inconsistent with the wording in the New Development Supplementary Guidance (SG) (CD/09). In particular, the last paragraph of the policy states "The above criteria as well as the details outlined in the New Developments SG should be considered for all developments." This does not reflect the wording in the New Developments SG (CD/09) which states "will require proposals for development to meet the following criteria". <u>SportScotland (379)</u> It is not clear from this policy or the New Development SG (CD/09) that outdoor sport and recreation interests will be protected from renewables development. The closest reference is 'amenity of existing uses', but it is not clear what this extends to. SportScotland recommends that specific reference is made to impacts on sport and recreation interests within Policy I6 and the new Development SG (CD/09). It is crucial that outdoor sport and recreation interests are taken into consideration in renewables development. We recognise that Policy I6 protects landscape impacts and that recreational users will benefit from this. However it is the physical impact on recreation that is important to safeguard, such as walking and cycling routes and rivers that are important for canoeing.		

Scottish Renewables (1865)

Concern is raised with regard to the council's statement that "at present there are limitations to the implementation of wind power renewable technologies in Renfrewshire due to radar restrictions which rules out almost all of the area for wind farm development". Whilst it is recognised there may be some limitations it should be noted that mitigation to these issues can and has been applied to these sites. Technical constraints, such as "aviation and defence and broadcasting installations" which should not be a consideration of the planning authority.

The council is encouraged to observe the Scottish Governments three stage approach to spatial frameworks for wind farm development. National and international designations should be considered as of higher importance than areas of significant protection due to being within 2km of built up areas or within the greenbelt. The council is encouraged to engage in further consultation to provide clarity around the potential for wind farm developments of less than 20MW.

SEPA (2108)

Objection to the Proposed Plan as there is no reference made to SEPA's Thermal Treatment of Waste Guidelines (CD/31). Links must be drawn between waste, climate change, energy, economy and infrastructure issues. Heat recovery is a key part of decision making when allocating sites for thermal plants and opportunities to site new plant close to existing and potential users of heat and power should be taken.

Modifications sought by those submitting representations:

None suggested. (183, 1865)

Recommend the following wording for the policy in order to be consistent with the New Developments Supplementary Guidance (CD/09). "Any development will be required to comply with the above criteria as well as the details outlined in the New Development SG". (226)

Recommends that specific reference is made to impacts on sport and recreation interests as part of Policy I6 and the New Development SG (CD/09). (379)

A reference to SEPA's Thermal Treatment of Waste Guidelines should be included in Policy I6. (2108)

Summary of responses (including reasons) by planning authority:

RSPB Scotland (183)

The support for the policy is noted and welcomed.

SNH (226)

It is agreed that the wording is inconsistent and that the requirement should be emphasised within Policy I6 of the proposed Local Development Plan (LDP). Should the reporter be minded to, the wording of Policy I6 could be amended with an additional line added as follows,

“Any development will be required to comply with the above criteria as well as the details outlined in the New Development SG”.

SportScotland (379)

Policy I6 sets out the criteria which will specifically apply to renewable energy proposals. It is agreed that the reference to the “amenity of existing or allocated uses”, is general and would refer to the range of uses which could potentially be impacted on by a renewable development. Specific protection of recreational uses is however provided under Policy P8 - Open Space, under which all development proposals, including renewables, must protect or enhance open space, recreational areas and amenity space. For the above reason it is considered unnecessary to state that sport and recreational interests need to be protected from renewable developments specifically within Policy I6.

Radar Restrictions (1865)

Scottish Planning Policy (SPP) (paragraph 190)(CD/03), explicitly states that, “when identifying areas of constraint, planning authorities should consider...impact on aviation and defence interests...and... impact on broadcasting installations.” It is therefore rejected that these should not be a consideration of the planning authority. It is accepted that these may be mitigated. Therefore, while the supporting text to Policy I6, by way of guidance, states that these are likely to be a constraint across the local authority area, Policy I6 states that the impact on these must be considered for renewable development proposals.

Spatial Framework (1865)

The three stage approach to a spatial framework for the location of windfarm developments of 20MW capacity or greater, has been observed by the council as set out in Background Paper 1 – Renewables (CD/32). It is rejected that areas with national and international designations should be given greater weight than greenbelt designation, with regards to identifying areas of significant protection. These are given equal weighting and are in many cases overlapping with each other. It therefore remains that the whole of Renfrewshire is an area of significant protection. It is accepted that the distance of 2km, which it is recommended to observe in SPP(CD/03), is a guideline for identifying areas of significant constraint. Nevertheless the whole local authority area would be an area of considerable constraint due to the potential impact on aviation interests. Therefore even smaller scale windfarm developments are required by Policy I6 to have regard to this constraint. The constraints as identified should not be considered to impose a blanket restriction on development. It is proposed in the New Development Supplementary Guidance (CD/09) and LDP Action Programme (CD/01) that the capacity for large scale wind energy developments will be investigated by the council and that guidance will be prepared for small scale windfarm developments so as to further direct this type of development to the most appropriate areas.

SEPA (2108)

The council recognises the important link to be drawn between waste management, renewable heat, climate change, economy and infrastructure issues. We would suggest that given SEPA’s Thermal Treatment of Waste (CD/31) is a guideline that it would be best placed in the New Development SG (CD/09). Policy I6 aims to encourage all types of

renewable and low carbon energy developments. To single out recovering energy from waste would require us to set out all other potential developments within this category.

We would request that the reporter notes that the below paragraph will be inserted into page 25 of the New Development SG – Renewable and Low Carbon Technologies (CD/09), therefore it is considered that no modification is required to be made to the LDP:

SEPA's Thermal Treatment of Waste Guidelines (CD/31) should be referred to where the development involves recovering energy from waste. Development would be encouraged and supported where thermal treatment plants are co-located with existing energy and heat intensive uses which maximise the opportunities for effective energy use.

Reporter's conclusions:

RSPB Scotland

1. The support expressed by RSPB Scotland is not an unresolved representation and does not require to be considered as part of the local plan examination.

SNH

2. The council accepts that the policy wording is inconsistent with the wording in the New Development SG and is happy to accept the modification proposed by SNH. I agree that the policy wording requires to be modified to address SNH's concerns.

SportScotland

3. Paragraph 187 of SPP provides that development plans should provide a clear indication of the potential for development of wind farms of all scales, and should set out the criteria that will be considered in deciding applications for all wind farm developments including extensions. The criteria will vary depending on the scale of development and its relationship to the characteristics of the surrounding area, but are likely to include (among other things) the effect on tourism and recreation interests. Paragraph 190 of SPP makes clear that when identifying areas with potential constraints on wind farm development, planning authorities should take into account tourism and recreation interests.

4. In relation to the suggestion that this policy test should be amended to include specific reference to outdoor sport and recreation interests, I do not accept the council's contention that Policy P8 satisfactorily addresses this point. The purpose of Policy P8 is to protect and where possible enhance open space, recreational areas and amenity space. That is not the same as mitigating the physical impact of development on active recreational pursuits. Paragraph 149 of SPP is clear that planning authorities should support, protect and enhance open space and opportunities for sport and recreation. I agree with SportScotland that tourism and sport and recreation interests could include walking and cycling routes and rivers that are important for canoeing. Modifying Policy I6 to include a reference to sport and recreation interests would be consistent with SPP and address the difficulty with the council's contention identified in the preceding paragraph.

Radar restrictions

5. Paragraph 190 of SPP states that when identifying areas with potential constraints on

wind farm development, planning authorities should consider impact on aviation and defence interests, particularly airport and aerodrome operation, flight activity, tactical training areas and aviation and defence radar, as well as impact on broadcasting installations, particularly maintaining transmission links. These are quite clearly, therefore, legitimate matters for the council to take into consideration as planning authority.

Spatial strategy

6. As already stated, development plans should provide a clear indication of the potential for development of wind farms of all scales. Diagram 16 of the SDP identifies broad areas of search for wind farm developments so as to provide a strategic spatial framework for more detailed local development planning. None of these areas are in Renfrewshire.

7. The SDP requires local authorities, among other things, to distinguish those areas outwith the broad areas of search which require significant protection from those with potential constraints. Paragraph 189 of SPP provides that planning authorities should set out in the development plan a spatial framework for onshore wind farms of over 20 megawatts generating capacity. Authorities may incorporate wind farms of less than 20 megawatts generating capacity in their spatial framework if considered appropriate. The spatial framework should identify:

- areas requiring significant protection because they are designated for their national or international landscape or natural heritage value, are designated as green belt or are areas where the cumulative impact of existing and consented wind farms limits further development,
- areas with potential constraints where proposals will be considered on their individual merits against identified criteria, and
- areas of search where appropriate proposals are likely to be supported subject to detailed consideration against identified criteria.

8. Paragraph 190 of SPP provides that a separation distance of up to two kilometres between areas of search and the edge of cities, towns and villages is recommended to guide developments to the most appropriate sites and to reduce visual impact. Decisions on individual developments should take into account specific local circumstances and geography. Development plans should recognise that the existence of these constraints on wind farm development does not impose a blanket restriction on development, and should be clear on the extent of constraints and the factors that should be satisfactorily addressed to enable development to take place.

9. Taking into account all of the above, it can be seen that the whole of Renfrewshire has been identified by the council as an area of significant constraint when it comes to wind farm developments. That is because of the two kilometres separation distance, the greenbelt, or aviation or other restrictions. It appears to me to be logical therefore, for the council to consider Renfrewshire to be an area with potential constraints where proposals will be require to be considered on their individual merits against identified criteria. This appears to me to accord with the relevant provisions of SPP.

10. The SDP identifies broad areas of search for wind farm developments so as to provide a strategic spatial framework for more detailed local development planning. None

of these areas of search are in Renfrewshire. In view of this and having regard to the policy guidance in SPP and the above constraints, I agree with the council that in Renfrewshire proposals should be considered on their individual merits against identified criteria. I also note that the council intends to bring forward an advice note which will provide guidance on small scale wind energy developments and their location. The constraints referred to above do not impose a blanket ban on development. Taking all these matters into account, I am not persuaded that any modification to the plan in this respect is justified.

SEPA

11. While I accept that thermal treatment of waste may be considered to be a renewable or low carbon technology, I also note that the council intends to bring forward an advice note which will provide guidance on small scale wind energy developments and their location. I do not consider that a reference to SEPA's *Thermal Treatment of Waste Guidelines* should be incorporated into such a broadly worded policy as Policy I6. The council's declared intention to include an appropriate reference to the guidelines in the New Development SG is, in my opinion, sufficient to address the concerns raised by SEPA.

Reporter's recommendations:

I recommend that the following modifications to Policy I6 be made:

1. Delete the last line of the wording of Policy I6 and substitute "Any development will require to comply with the above criteria as well as the criteria set out in the council's New Development SG."
2. Add new criterion to Policy I6 as undernoted:

"outdoor sport and recreation interests".

Issue 14	Policy I7 Low Carbon Developments	
Development plan reference:	Policy I7 Low Carbon Developments	Reporter: Ron Jackson
Body or person(s) submitting a representation raising the issue (including reference number):		
NRG Style Ltd (2031) MEPC (2081) Homes for Scotland (2085)		
Provision of the development plan to which the issue relates:	Policy I7 requires new buildings, with some exceptions, to employ carbon reducing technology so as to reduce carbon dioxide emissions.	
Planning authority's summary of the representation(s):		
<u>NRG Style Ltd (2031)</u> Policy I7 is a welcome advance in the policy position in relation to renewable energy. A wider view should be taken to the contribution that housing development can make towards achieving low- and ultimately zero-carbon buildings. Although improved energy standards are being incorporated into building regulations, these will continue to be revised upwards within the period of the Local Development Plan. An increasing proportion of these standards will require to be met by low- and zero-carbon technologies. Consideration should be given to how existing policy will be revised or new policies brought forward to address this and other implications of Section 3F of the Town and Country Planning (Scotland) Act 1997 (CD/33). Further consideration should be given to the implications that Section 3F has for alteration or extension of existing buildings; change of use and conversion of existing buildings; and retrofitting the urban environment. Specific concern is raised regarding the potential for assessment of "character and amenity" to restrict the ability to achieve the desired outcomes of carbon reduction and energy efficiency.		
<u>MEPC (2081)</u> MEPC supports the principles of working towards low carbon developments. Policy I7 is considered to be too rigid and therefore is liable to become a barrier to growth in some cases. There may be circumstances where it is neither practical nor viable to achieve the carbon reduction standards proposed.		
<u>Homes for Scotland (2085)</u> The development plan is not the place to seek implementation of energy-efficiency measures in new-build, Policy I7 is therefore inappropriate. The 2007 Building Regulations are now superseded (CD/34). The 2010 Regulations apply (CD/35), and by the time this LDP is adopted the 2013 Regulations may be in place. The 2010 Standards can be achieved without the use of micro-generation technologies. Although some		

developers choose to use generating technologies, there continues to be issues surrounding their use. As such it is not appropriate for planning documents to promote them. It is accepted that planning, through supplementary guidance, can deal with siting and design issues. Planning policy should only encourage rather than require energy-efficiency standards in excess of the statutory requirements as set by the Building Standards.

Modifications sought by those submitting representations:

None suggested (2031)

Policy 17 should be reworded: "The submission of a statement will be required to demonstrate to the satisfaction of the Council that this requirement can be met, or setting out the reasons why it is not possible or viable to be met in part or full." (2081)

It is suggested that the first paragraph of Policy 17 is replaced with: "All new buildings will conform to the energy performance requirements of the Building Standards in force at the time of a planning application. In addition, the Council will support proposals from developers who seek to introduce innovative approaches to achieving higher efficiency standards, including low and zero-carbon buildings." (2085)

Summary of responses (including reasons) by planning authority:

NRG Style Ltd (2031)

The support for Policy 17 of the proposed Local Development Plan (LDP) is noted and welcomed. It is considered that Policy 17 meets the requirements of Section 3F of the Town and Country Planning (Scotland) Act 1997 (CD/33) with regards to new buildings. It is acknowledged that energy efficiency is a changing policy context, which will increasingly require low- or zero-carbon technology but at this time Section 3F does not apply to alterations and extensions or change of use and conversions of existing buildings. These types of development have been exempted under Policy 17. The New Development Supplementary Guidance (CD/09) outlines how these technologies will be assessed so as to ensure that the required standard can be met. Although it is agreed that the potential impact on "character and amenity" would need to be assessed, it is not considered that these amount to a blanket restriction on low carbon developments. It is agreed that further consideration should be given to low- and zero-carbon generating technologies and their potential application for buildings which are not currently subject to the Building Regulations or Policy 17. This would however be most appropriately considered within supplementary guidance.

MEPC (2081)

It is agreed that consideration should be given to developments in circumstances where a developer is able to demonstrate significant technical constraints to using on-site low and zero carbon generating technologies, in so far as the required Building Regulations are met. If the reporter is so minded the following wording could be added to Policy 17: "or setting out the reasons why it is not possible or viable to be met in part or full."

Homes for Scotland (2085)

Although it is agreed that the 2007 Building Regulation (CD/34) is now superseded; it has

been used as a benchmark for comparing the increased standards set out in subsequent Building Regulations. Policy I7 uses the 2007 Regulations as a benchmark so as to provide a consistent reference point which will not change although the Building Regulations will be superseded again in the life of the Local Development Plan.

Section 72 of the Climate Change (Scotland) Act 2009 (CD/36), introduces Section 3F into the Town and Country Planning (Scotland) Act 1997 (CD/33). Section 3F states: "A planning authority, in any local development plan prepared by them, must include policies requiring all developments in the local development plan area to be designed so as to ensure that all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions from their use, calculated on the basis of the approved design and plans for the specific development, through the installation and operation of low and zero-carbon generating technologies." This requirement is set out in Policy I7 - Low Carbon Developments. It is therefore rejected that it is not appropriate for planning policies to seek the implementation of energy efficiency measures. This requirement is statutory therefore the suggested modification is also rejected.

Reporter's conclusions:

NRG Style Ltd

1. As stated above, section 3F of the Town and Country Planning (Scotland) Act 1997 (CD/33) requires the council to include in the development plan, policies requiring all new buildings to 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. Section 3F does not apply to alterations or extensions to existing buildings.
2. Policy I7 requires all new buildings (apart from those reasonably excepted) to install technology to reduce predicted carbon dioxide emissions by at least 15% below 2007 Building Standards. In my opinion, and subject to the qualification in paragraph 3 below, the policy is not inconsistent with the provisions of section 3F.

MEPC

3. I agree with the council that, in order that Policy I7 does not simply become a barrier to sustainable growth that otherwise would be acceptable, the policy should be modified as suggested.

Homes for Scotland

4. Since section 3F of the 1997 Act is a statutory requirement, the council must deliver that requirement, notwithstanding the requirements of Building Standards. I have already found that the policy, modified as below, is consistent with section 3F.

Reporter's recommendations:

I recommend that the following modification to Policy I7 be made:

Add the words "or setting out the reasons why it is neither practical not viable to meet the requirement in part or in full" after the word "met" at the end of Policy I7.

Issue 15	Policy I8 - Waste Management	
Development plan reference:	Policy I8 - Waste Management	Reporter: Karen Heywood
Body or person(s) submitting a representation raising the issue (including reference number):		
Stephen McIntosh (2087) Scottish Environmental Protection Agency (SEPA) (2108)		
Provision of the development plan to which the issue relates:	To ensure that existing waste management facilities and infrastructure are safeguarded and nearby incompatible uses are resisted.	
Planning authority's summary of the representation(s):		
<u>Stephen McIntosh (2087)</u> Waste management businesses should not be located in town centres, adjacent to homes or near railway lines. They should be planned on the outskirts of town where lorries can safely deliver or collect bulk items and they would not be an eyesore or fire hazard. <u>SEPA (2108)</u> Policy I8 - Waste Management is supported in principle although an objection is raised because no reference is made to waste being a compatible use on employment/industrial land.		
Modifications sought by those submitting representations:		
None suggested (2087) A suggested alteration is to amend Policy I8 to include "...or on land designated for Renfrewshire's Economic Investment Locations or Transition Areas (subject to site specific considerations)" (2108)		
Summary of responses (including reasons) by planning authority:		
<u>Stephen McIntosh (2087)</u> Policy I8 - Waste Management aims to set out the necessary criteria for identification of appropriate sites for waste management developments. It is not considered appropriate to identify specific areas as suitable for waste management uses, nor to propose areas where waste management will be unacceptable. By taking a criteria based approach, individual proposals must be assessed on a case by case basis, taking consideration of the concerns raised about the impact on the existing road network and neighbouring uses.		

SEPA (2108)

The council have had further discussions regarding the wording in both the proposed Local Development Plan (LDP) and the New Development Supplementary Guidance (SG) (CD/09) and have agreed with SEPA that the wording requires to be altered. If the reporter is so minded Policy I8 - Waste Management, could be altered to read:

“The Council recognises the potential of waste management in contributing to the delivery of a green economy and sustainable economic growth within Renfrewshire. Existing waste management infrastructure and facilities will be safeguarded where they support the delivery of the Zero Waste Plan and incompatible uses in the vicinity of current sites will be resisted. Development proposals for waste management infrastructure and facilities on new or existing sites will require to demonstrate how it conforms to, meets and delivers the objectives of the Zero Waste Plan as well as demonstrating the following:

- Ensure that the site has a good level of accessibility and the development does not have an adverse impact on the existing road network;*
- Keep transportation of waste to a minimum;*
- Be able to co-exist with surrounding existing and allocated land uses;*
- Be located on or adjacent to land previously licensed for waste management processes without impact upon amenity or operation of other uses or on land designated for Renfrewshire's Economic Investment Locations or Transition Areas subject to site specific considerations;”*

We would request that the Reporter notes that in the New Development Supplementary Guidance (CD/09) it is proposed to include the following bullet point in the Strategic Economic Investment Locations, Local Industrial Areas and Industrial Transition Area criteria which is outlined on P.5:

Strategic Economic Investment Locations

- Proposals for waste management infrastructure will be acceptable within Strategic Economic Investment Locations where it conforms to, meets and delivers the objectives of the Zero Waste Plan as well as demonstrating that it will not impact upon amenity or operation of other uses, subject to site specific considerations.*

Local Industrial Areas

- Proposals for waste management infrastructure will be acceptable within Local Industrial Areas where it conforms to, meets and delivers the objectives of the Zero Waste Plan as well as demonstrating that it will not impact upon amenity or operation of other uses, subject to site specific considerations.*

Industrial Transition Area

- Proposals for waste management infrastructure will be acceptable within Industrial Transition Areas where it conforms to, meets and delivers the objectives of the Zero Waste Plan as well as demonstrating that it will not impact upon amenity or operation of other uses, subject to site specific considerations.*

Reporter's conclusions:

Stephen McIntosh

1. Policy I8 - Waste Management takes a criteria based approach to waste management proposals. Each proposed waste management development would be assessed on a case by case basis, taking consideration of the criteria in the policy. These criteria include that the proposal should not have an adverse impact on the existing road network and that it should be able to co-exist with neighbouring uses. As these are the matters which Mr McIntosh is concerned about, I do not consider it is necessary to change the policy in response to his representation.

SEPA

2. The council and SEPA have had further discussions regarding the wording in the proposed plan and have agreed an addition to Policy I8 so that the policy refers to waste being a compatible use on employment/industrial land. I see no reason to disagree. The council has clarified that only the fourth bullet point of Policy I8 should be changed. The other four bullet points should remain as detailed in the proposed plan.

3. The changes to the New Development Supplementary Guidance are a matter for the council.

Reporter's recommendations:

1. The fourth bullet point of policy I8 – Waste Management should be replaced with the following:

Be located on or adjacent to land previously licensed for waste management processes without impact upon amenity or operation of other uses or on land designated for Renfrewshire's Economic Investment Locations or Transition Areas, subject to site specific considerations;

Issue 16	POLICY P1 – Renfrewshire’s Places	
Development plan reference:	Policy P1 – Renfrewshire’s Places	Reporter: Dannie Onn
Body or person(s) submitting a representation raising the issue (including reference number):		
Railway Paths Ltd (91) Alastair Penney (124) Dr. Cameron Aitchison (126) Iain Satterthwaite (127) John Michael Brown (156) Robert Nugent (181) Lidl U.K.GmbH (1840)		Richard Cotter (1846) Dr. Robert Hillman (2022) Elderslie Community Council (2059) Alex McCallum (2067) Bridge of Weir Community Council (2065)
Provision of the development plan to which the issue relates:	Seek to promote the delivery of well designed, sustainable places that respect their surroundings and create a sense of place.	
Planning authority’s summary of the representation(s):		
<p>Bridge of Weir</p> <p>Ranfurly Castle Golf Course, Bridge of Weir (site ref: 2248)</p> <p><u>Alastair Penney (124), Dr. Cameron Aitchison (126), Iain Satterthwaite (127), John Michael Brown (156), Richard Cotter (1846), Dr. Robert Hillman (2022), Bridge of Weir Community Council (2065)</u></p> <p>Object to the land use zoning in the proposed LDP. The site consists of the 18th green and rear fairway, part of the golf course. The Place strategy aims to protect and enhance the built and natural heritage within each place and redevelopment of site 2248 under Policy P1 would be contrary to that aim. Zoning the site as green belt would be a sensible reinforcement of the existing status quo, rather than zoning as urban, which would effectively introduce an illogical contradiction regarding the status of that plot. There would also be a knock-on effect to a development here, since the golf course would presumably want to build a replacement, fit for purpose, club house.</p> <p>Site at the former station site, north of Bridge of Weir Road (site ref: 2301)</p> <p><u>Railway Paths Ltd (91)</u></p> <p>It is not clear in the wording or elsewhere in the document of what the intention of Policy P1 is and my concern is that the test of “significant impact” could fail schemes which have significant positive impacts. The reader would naturally assume that this policy only applies to minor infill schemes of the same land use.</p>		

Elderslie

Elderslie Community Council (2059)

Object to the proposed LDP, as it fails Elderslie's village centre. There is no recognition of the vacancy/dereliction (existing and proposed) in the heart of the village, or the important role that the development plan and the Council's planners could play in putting the future of the village centre on a positive trajectory.

Paisley

Lidl U.K.GmbH (1840)

Objection to the P1 zoning given to the former Dobbies site on Barrhead Road, Paisley. Request consideration be given to a mixed use retail/ residential zoning. A standard Lidl store extending to circa 17,000 sq ft gross with 80 car parking spaces and could be accommodated on the front section of the site, and leave the remainder for other retail or residential development.

Houston

Robert Nugent (181)

Object to the allocation of the site at Manse Crescent, Houston (reference 0030) for amenity use. There is a field and swing park less than 100 yards from this land which used for events and is much nearer the village halls and centre of the village so cannot see why this piece of land which is never used should have this restrictive allocation placed on it.

Langbank

Alex McCallum (2067)

Object to the site at Eastbank, Langbank (reference 5053) being zoned as Policy ENV 1 it should be rezoned as Policy P1.

Modifications sought by those submitting representations:

No modifications suggested. (124, 126, 127, 156, 1846, 2022, 2059, 2065)

Suggest that the second sentence of P1 reads:

"New developments within these areas should be compatible and complementary to existing uses and demonstrate that they would cause no significant harmful impact on these areas as set out by the criteria in the New Development SG (CD/09)". (91)

Re-zone the former Dobbies site as mixed use retail / residential. (1840)

This area (reference 0030) should be utilised for flatted development for elderly people. (181)

Rezone site from Policy ENV1 to Policy P1. (2067)

Summary of responses (including reasons) by planning authority:

Bridge of Weir

Ranfurly Castle Golf Course, Bridge of Weir (site reference 2248):

Alastair Penney (124), Dr. Cameron Aitchison (126), Iain Satterthwaite (127), John Michael Brown (156), Richard Cotter (1846), Dr. Robert Hillman (2022), Bridge of Weir Community Council (2065)

In the current adopted Renfrewshire Local Plan this site is zoned as H1- General Residential Policy. The proposed LDP zones this site as Policy P1 – Renfrewshire’s Places as the planning authority favours the continuation of the attractive built form. The golf course and the listed club house building are considered assets to the place. Any development proposed for this site would require to ensure that there is no significant impact on existing uses and that it added to the attractive environment of the place. The club house, associated buildings and land are considered integral to the village envelope and conservation area and therefore there should be no change to the land use zoning at this site, it is not necessary.

Railway Paths Ltd (91)

In line with Scottish Planning Policy (SPP) (CD/03), Policy P1 aims to deliver better places. It is recognised that there are many assets within our existing places which should be preserve and enhanced. It is considered that Policy P1 protects and preserves but also provides a degree of flexibility to deliver a range of uses which are compatible with certain places and could add to the vibrancy and growth of an area. The council considers that the intention of Policy P1 is well explained in the text within the Places section of the proposed LDP. The uncoloured areas on the LDP proposals maps are quite extensive and therefore disagree that this only allows for minor infill developments. It is agreed that the rural villages may offer less opportunity for significant development. However this is due to the overall LDP spatial strategy to direct growth to more sustainable areas. It is considered that Policy P1 allows for a mix of uses rather than concentrating solely on residential development. The council disagree with the need to alter the wording. Therefore, no amendment to the policy.

Elderslie

Elderslie Community Council (2059)

It is agreed that the LDP has a positive role to play on putting the village centre on a positive trajectory, as it does with each town and village within the Renfrewshire area. The Policy P1 zoning for Elderslie village centre is considered appropriate as it aims to protect the favourable elements of the village and allow for development where appropriate. It is recognised that there is a need for positive enhancement of the range of facilities / services as well as the physical fabric and public realm of Elderslie village. However it is considered that the most appropriate way forward for implementing and delivering this objective is not to amend the proposed LDP but to take a proactive approach and identify an individual action or actions with the LDP Action Programme (CD/01) to develop in partnership with the community and others, a range of initiatives which will help to promote development and enhancement of each town and village centre. This would be in line with SPP (CD/03) where it is proposed to carry out centre

health checks, analysing the strengths, weaknesses and resilience of a centre and well as its vitality and viability. The development of town and village centres strategies would also help to deliver improvements. Undertaking centre health checks and the development of town and village centre strategies will be outlined fully in the LDP Action Programme (CD/01), therefore there is no requirement to change the land use zoning for Elderslie centre. If the Reporter is so minded to agree that the following additional action is added to the LDP Action Programme (CD/01) and that the LDP remains unchanged in this respect.

Delivering the Centres Strategy:

Ref No.	LDP Action	Policy / Proposal	Lead / Partners	Time-scales	Funding Details / Risk	Progress
28	To undertake centre health checks for Strategic Centres, Core Town Centres and Local Service Centres including Elderslie Centre and to develop centre strategies where appropriate to deliver improvements within centres	C1, C2, P1	RC Planning & Economic Development	2014 - 2016	Not required	

Paisley

Lidl U.K.GmbH (1840)

The site is covered by Policy P1 which allows for a range of developments which are compatible and complementary to surrounding uses, provided the development adds to the place and is subject to assessment against the criteria set out in the New Development Supplementary Guidance (SG) (CD/09). Policy P1 does not preclude retail where it is seen to be meeting local neighbourhood demand. If a case is made that there is sufficient capacity and that the location and scale of the proposals would not significantly impact upon existing centres then retail on this site may be accepted. However this would be the case for many other uses which could be accommodated on that site. If this site was zoned for something specific this may prevent the surrounding community from benefiting from various opportunities that may come forward for this site. It is not necessary to rezone part of the site for a potential retail use for the reasons provided above.

Houston

Robert Nugent (181)

The site at Manse Crescent in Houston is zoned as Policy P1 as like many areas of green infrastructure it is an integral part of the settlement. It is considered that there are other sites for housing identified within Houston, brownfield and greenfield that are more appropriate for residential use than this site. A housing site in the green belt is allocated to the north east which could accommodate a residential development for the elderly. Retaining this piece of amenity space would provide communal open space for the residents on all three sides of the site. The Policy P1 zoning is appropriate for this area of greenspace in the middle of the settlement. It is not required for residential development. It is not considered appropriate to change the land use zoning.

Langbank

Alex McCallum (2067)

The identification of this site as an alternative development site is detailed in Issue 33. The reason why this site is not appropriate to be zoned as Policy P1 is that due to extensive landscaping, topography and the rail line, the site does not integrated with the settlement of Langbank. It sits outside the village envelope and extending the settlement in an eastward direction would only lead to further incremental additions. It is consider that zoning this site as Policy P1 would not add to the place in fact the loss of the high quality landscape setting that this site provides on the entrance and exit to this village would have a negative impact on the attractiveness of the place. The site should remain in the green belt, changing the land use zoning to Policy P1 is not appropriate.

Reporter's conclusions:

1. Policy P1 supports new development on those parts of Renfrewshire which are uncoloured on the proposals maps, provided that they are compatible and complementary to existing uses and cause no significant impact upon them. The Places section of the proposed plan restates the focus on the re-development of available brownfield land. It also makes it clear that the proposed supplementary guidance will manage the quality of development to preserve and enhance the character and amenity of the places.
2. Even though that guidance is likely to provide clarity through detailed provisions, I agree that the wording of the policy as set out could discourage development with a significant yet positive effect. It would strengthen the policy and improve consistency with the underlying intention if the wording were changed to prevent significant harm. The range of development which might be permitted under this policy does not need to be set out in the proposed plan, but may be made clear in the proposed supplementary guidance.
3. A number of site specific suggestions are made for changing the P1 policy designation on the proposals maps. I deal with these below.
4. At **Ranfurly Castle Golf Club** on Clevans Road, Bridge of Weir, the club house and part of the course are included in the proposed plan within the policy P1 area and

therefore outwith the green belt. The line on the proposals map logically follows the line of existing development and incorporates the club house and car parking as part of the built development along the roadside. It would not appear to include part of the golf course. The P1 zoning would allow new development in accordance with the policy. However, any proposals would have to take into account the impact on neighbouring properties, the impact on the listed clubhouse and the conservation area, and the capacity of the roads and drainage. Although the openness of the golf course is an asset to the area, I do not think that this would be significantly compromised by development on this site. No modification is needed.

5. A suggested site further west along Clevans Road, Bridge of Weir is considered at issue 26 of this report.

6. **Land at Manse Crescent, Houston** is within the policy P1 area on the proposals map. That does not preclude development, subject to the policy and the proposed supplementary guidance. Whether land needs to be kept for amenity purposes is a matter for any planning application. No modification to the proposed plan is needed.

7. The former Dobbies site on **Barrhead / Hawkhead Road, Paisley** lies within the P1 designation. That would allow for a variety of uses subject to the requirements of the policies in the proposed plan and associated supplementary guidance. These are matters for any planning application in due course. Thus a change to a retail or mixed use allocation is not necessary.

8. **Elderslie** is covered by the general policy P1 designation. Elderslie Community Council is concerned that the village centre needs greater policy support. The implication is that there should be a centre specific policy and therefore I have dealt with the representations on this matter at issue 45 which deals with new policy suggestions.

9. The site at **East Bank, Langbank** is dealt with as a suggested site at issue 33. Given the site specific conclusions reached there, I consider that the site is not suitable for inclusion in the P1 zoning on the proposals map. No modification is therefore necessary.

Reporter's recommendations:

Modify Policy P1 by removing the words 'impact on' and replacing them with the words 'harm to'.

Issue 17	Policy P2 – Housing Land Supply	
Development plan reference:	Policy P2 – Housing Land Supply	Reporter: Dannie Onn
Body or person(s) submitting a representation raising the issue (including reference number):		
<div>Elderslie Estates (12) Persimmon Homes (West) Scotland (186) Mrs G. McCarney (216) Glasgow City Council (204) Michael Hopcroft (344) Christopher Sherlock-Scougall (511) Mr Gordon Cullen (517) Church of Scotland (1810) Granite Properties (1817) Ann & John Cameron (1823) Tesco Stores Ltd (1829) David & Helen Robertson (1834) Glentyan Estate (1864) Stewart Milne Homes (1883) Duncan MacIntosh (1891) Mary Mungin (1916)</div> <div>Ranfurly Estates (1980) Pamela Sloan (2063) Bridge of Weir Community Council (2065) Homes for Scotland (2085) David Wilson Homes (2095) Blythwood Estate (2104) Councillor Paul Mack (2105) Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112) Cala Homes (West) (2114) Paisley South Standard Letter: See Appendix 1 attached.</div>		
Provision of the development plan to which the issue relates:	The policy aims to maintain a 5-year supply of effective housing land at all times.	
Planning authority’s summary of the representation(s):		
<p>Existing housing land supply</p> <p>Paisley South Standard Letter (520 521 522 523 524 525 526 527 528, 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 1775 1790 1791 1792 1793 1794)</p> <p>There would appear to be enough brownfield sites available to accommodate the need for future housing.</p> <p><u>David & Helen Robertson (1834)</u></p> <p>The identified brownfield sites have a capacity of almost 10,000 houses, which is more than the council have stated are required by 2025.</p> <p><u>Christopher Sherlock-Scougall (511)</u></p>		

Paisley has many brownfield sites which taken together should be put forward in the LDP as 'land identified as possible long term residential expansion to Paisley'

Pamela Sloan (2063)

Renfrewshire Council needs to double its efforts to the promotion and marketing of brownfield sites. There needs to be a better management and appropriate allocation of existing council housing / housing association stock, which should be a priority, and the council needs to work more closely with private landlords to better support housing needs. The provision of land for housing seems sufficient.

Identified housing land supply

Glasgow City Council (204)

It is recognised that the land supply is more than sufficient to meet the requirement set out in the Strategic Development Plan (CD/02).

Duncan MacIntosh (1891)

The forecasts outlined for the housing need and demand assessment (CD/37) are not based on extrapolating from completions for 2008 – 12 (507pa) but rather on the unjustified hope of meeting earlier optimistic forecasts. If completions continue at 507pa in the period 2012 – 16 rather than the 895pa now forecast, this would reduce the total houses requiring to be built by 2025 by 1152. Therefore areas such as Paisley South Expansion Area would not be required. The LDP offers more sites than it forecasts would be needed.

Ann & John Cameron (1823)

Development of the greenbelt is unnecessary to meet the forecast for new housing. The many other housing sites identified in the plan have capacity for 9990 homes, exceeding the target for the period up to 2025.

Mrs G. McCarney (216)

The LDP states that a generous supply of appropriate and effective land, providing a range and choice of sites for 10 years has been identified. Therefore, it is clear that there is no need to consider the release of the Paisley South in the short to medium term up to 2025.

Homes for Scotland (2085), Stewart Milne Homes (1883)

The LDP fails to demonstrate that the effectiveness, deliverability or generosity of the land supply has been properly assessed. Consequently, there is a significant risk that the Plan will fail to deliver the housing to meet the assessed requirements.

From the Housing Land Audit (CD/38), it is agreed that there have been 2028 completions from 2008/09 to 11/12, leaving a balance of requirement to be met of 9772. The total established supply is agreed as 7939. However, the 5-year effective supply is 2064 not 3070, leaving 5875 beyond 5 years.

1414 sites are identified through the Housing Action Programme . It is clear from the list of these sites that many have physical, environmental and economic challenges, but no evidence is shown as to how these can be overcome and the site delivered.

543 additional units are identified in the green belt, and Homes for Scotland cannot comment on these in any detail, other than to note that between the new sites and the Action Programme sites, there appears to be an emphasis on publicly-owned sites which is not properly acknowledged in the Plan. However, again there is no evidence presented on the effectiveness/deliverability of these sites.

Had the Council followed SPP (CD/03) and the SDP (CD/02) correctly, then the analysis of the housing land requirements would have been as follows:

Requirement 1 1800 less 2028 completions to date less 2064 effective sites less those sites which are agreed as effective and which extend beyond 5 years. From the Housing Land Audit (version 4) these total 1515. Therefore, the land supply which the Council would know with some certainty was effective/deliverable would be 5607. It is then for the LDP to demonstrate how it can identify the balance of 6193 potentially-effective/deliverable sites. If a 20% generosity allowance was added to that figure then the Council would require to identify through the Plan sites for 7430 additional houses.

Of course the starting point would be to verify which sites from the established supply could realistically be expected to come forward, added to the Housing Action Programme sites, with whatever balance remained to be found from new sites. It is for the Council to demonstrate if and how they have done that verification exercise.

It is evident that many additional sites were put forward for consideration, so it should be possible for the Council to present evidence to an Examination of their assessment of the established supply, and their preferences for additional sites from amongst those submitted but not currently allocated in the Proposed Plan.

If the council or Reporters accept that there is a shortfall in housing land allocations, then many additional site options have been put forward, providing an opportunity to create a better balance of sites in the housing land supply.

Persimmon Homes (West) Scotland (186), Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112), Cala Homes (West) 2114

The allocations in the Proposed LDP are insufficient to meet the housing land shortfall of up to 7609 homes up to 2025. The allocated sites only have a capacity of 1346 homes which is insufficient to address this revised housing land shortfall. Even if Paisley South Expansion Area could deliver 1000 homes by 2025, this is still inadequate to address the housing land shortfall. Further sites are required to be effective and capable of development during the plan period, with a particular focus on releasing sites which are capable of being effective over the next two years.

All sites including the additional housing sites (Policy P3) and housing action programme sites (Policy P4) are required to have an identified house builder or developer and to be proven as effective. The council need to clarify that this is the case. Further investigation by the council, in association with the private sector, is necessary to determine site effectiveness, future level of completions, lead-in periods and agreed annual build rates

from the sites in the established land supply to 2025.

The council has substantially overestimated the level of completions expected from the established land supply, particularly the programming of non-effective sites post 2018/19. The output is overly optimistic. The council has assumed that all of the remaining established land supply is effective over the plan period and built in full without any intervention. There is no evidence of how these non-effective sites become effective.

A number of the allocated sites are owned by the council and they need to be disposed of on the open market but no programme of releases over the LDP period has been indicated. It is therefore not yet possible to establish the anticipated build programme for these sites.

Stewart Milne Homes (1883)

Even assuming maximum output from the Housing Action Programme sites this leaves a shortfall in land supply in the Proposed LDP of between 4216 and 5473 units. By any standard this is a substantial shortfall in the land supply and one that can only be properly addressed through a significant number of additions to Schedules 1 and/or 2.

The Proposed LDP does not identify a wide enough range of sites in terms of location, type and capacity. There certainly do not appear to be sufficient sites that can be brought forward in the short term without the need for the provision of substantial front-end infrastructure.

The area known as the Paisley South Expansion area has not been mentioned in any preceding LDP documents. It has not been subject to the same consideration and evaluation as all other sites put to the council. Therefore object to inclusion of this site. The sites on land west of Barochan Road, Houston (Ref No. 5014) and land at Honeybog Hill, Paisley are effective sites and should certainly be preferred over the Council's suggested Paisley South Expansion area.

Ranfurly Estates (1980) Blythswood Estate (2104)

There is an over reliance on brownfield sites to deliver the housing land requirements. Despite previous successes in promoting brownfield sites, there is no guarantee that enough housing can be generated from brownfield alone. The Proposed LDP does not go far enough to ensure that Renfrewshire has allocated enough housing land to meet the requirements within the plan period. It is recommended that further land is released from the green belt to meet the requirements.

Church of Scotland (1810), Homes for Scotland (2085)

The housing land requirement set out in the plan is reliant on the delivery of the Community Growth Areas (CGAs) at Bishopton and Johnstone South West and the established urban centres. This option demonstrates risk, to deliver the majority of the required effective land within the timescale of the LDP, in this current financial climate. Experience across Scotland shows that around 30% of established supplies never come forward. Some of the supply, particularly in larger strategic areas, will take longer to build out than 2025. There is no evidence that the role of the smaller settlements and villages, in terms of their market attractiveness as locations for housing, has been considered. In particular, consideration of how growth in smaller settlements can contribute to sustaining

and improving their amenities and services. The council should consider releasing further land to ensure a steady supply of sites.

Glentyan Estate (1864), Homes for Scotland (2085), David Wilson Homes (2095)

There is an assumption made in the LDP that the entire effective and established land supply will be developed in full by 2025. The reality is many sites will not be delivered within the plan period. When reviewing the sites identified in the housing land supply, it is evident that many have been in the land supply for a number of years, prior to the economic downturn and have continuously failed to be delivered. There are serious concerns regarding the effectiveness of the housing land supply. Many of the sites are not truly effective due to historical land values/options, infrastructure or remediation costs required to deliver them. The lack of clean, effective sites is fast becoming a barrier to the delivery of housing.

Maintaining a 5 year effective land supply

Homes for Scotland (2085)

The Proposed LDP falls short in the amount of effective land it is required to identify to sustain an effective 5-year housing land supply. Much of the additional land proposed for release is publicly-owned, which does not guarantee that sites will come forward across the range of housing markets.

The established land supply comprises 95% brownfield sites and 5% greenfield sites. The addition of around 250 units identified in Schedule 2 of the Plan makes no significant impact on what is a grossly distorted balance of brownfield / greenfield. It is disputed that the Plan promotes a greater range and choice of sites in respect of brownfield / greenfield split.

Persimmon Homes (West) Scotland (186), Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112), Cala Homes (West)(2114)

It is evident that the council have not assessed whether its development strategy will deliver sufficient effective housing land supply to maintain a 5 year housing land supply at all times. The risk of failure of the proposed housing development strategy underperforming is unacceptably high. This risk is magnified given there is no mechanism in the Proposed LDP to remedy matters through the development process other than to remedy matters other than wait to the next review of the LDP.

Elderslie Estates (12)

It is unrealistically assumed that all of the established housing land supply will be effective. The effectiveness test in accordance with Scottish Government's guidance has not been undertaken. Housing sites have not been programmed, it is therefore impossible to assess whether the housing sites will be sufficient to maintain a 5 year supply at all times. Non-effective sites within the established land supply have only been partially assessed.

Generosity

Persimmon Homes (West) Scotland (186), Consortium of CALA Homes (West),

Persimmon Homes, Lynch Homes (2112), Stewart Milne Homes (1883), Cala Homes (West)(2114)

The council has failed to provide a generosity allowance in considering the housing shortfall. Applying a generosity allowance of 20% would require an additional 1268 homes to be allocated over the LDP period.

Glentyan Estate (1864)

A generous housing land supply has not been provided in the LDP. The surplus over and above the housing need and demand forecasts is misleading as this is made up almost entirely of the Paisley South Expansion Area, which itself has undergone no assessment to date of its suitability for development. Furthermore a site the size of Paisley South would be highly unlikely to be delivered in its entirety by 2025 given marketability pressures.

General

Persimmon Homes (West) Scotland (186), Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112) Cala Homes (West)(2114)

The housing land supply has not been agreed with the house building sector through Homes for Scotland.

Homes for Scotland (2085)

The Plan makes no reference to the fact that the SDP (CD/02) defines 11,000 of the all-tenure housing requirement for Renfrewshire as market housing and only 800 as affordable need. The Plan sets affordable housing target to equate to 1950 units for the period 2012 – 2025. Adding past completions for the SDP period from 2008/2009, the affordable housing target amounts to 2371 units against the 800 units as outlined in the SDP. This is a 300% over-statement in affordable housing targets in a context where delivery of such a target is extremely unlikely given the realities of funding and delivery. Furthermore there is no policy justification for such requirement.

Stewart Milne Homes (1883), Persimmon Homes (West) Scotland (186), Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112), Cala Homes (West)(2114)

Where a LDP requires to consider potential land allocations, it is normal practice for the planning authority to prepare methodology and make available a set of assessment criteria, scoring mechanism, to provide an understanding of how these sites have been ranked and a detailed final assessment of each site. This would demonstrate that all relevant factors have been taken into account, how they have been used to inform the proposed development strategy and that the weight attached to each factor has been appropriate. The Plan provides no information on this and is therefore deficient. There is a need for some form of independent, comparative assessment as part of the LDP examination.

Stewart Milne Homes (1883)

The council has ignored criticisms of the earlier assessment exercise in the preparation of the Proposed LDP. This is an unreasonable stance for the council to take, as it effectively

undermines the early engagement with the LDP process.

There is a lack of consistency between many of the background reports, the MIR and the Proposed Plan. The end result is complete confusion and a lack of transparency regarding the assessment of sites put forward during the LDP process.

Councillor Paul Mack (2105)

Genuinely at a loss to the Byzantine machinations of the Housing Need and Demand Assessment (HNDA) (CD/38). There are a number of existing brownfield sites around Paisley, as well as a large number of listed building which an unoccupied across Renfrewshire, which would surpass any housing target that require to be met to 2030.

Mary Mungin (1916)

Concern is raised regarding the assessment of the housing need until 2025. There are questions regarding how these figures have been arrived at. There is no simple, consumer-friendly digest of the housing need and demand.

Tesco Stores Ltd (1829)

While the detailed consideration of dwellings numbers for the housing site at the former St Mirren Park, Love Street, Paisley will be decided by a future planning application, Schedule 3 should change the number of units from 60 units to up to 264 units. The site should also be identified as a residential site in the proposals map.

Mr Gordon Cullen (517)

Schedule 3 in the proposed LDP indicates the site at Fordbank Stables, Beith Road, Johnstone has an indicative total capacity of 73 residential units with an effective capacity of 48 units. A planning application has been submitted by Dawn Homes for 57 units. In the early part of the planning process the planning application was originally going to be for 48 units but this has now changed. The plan should be altered to reflect the effective supply of 57 units and due regard must be given to the fact that the total number of units that could be built on this site would exceed 73 units. The established land supply in Schedule 3 of the proposed LDP should be altered.

Granite Properties (1817)

Whilst the Proposed LDP may provide a wider range, choice and future supply of housing sites in the Johnstone area, there is not one site allocated for less than 3 houses in the latest Renfrewshire housing land audit.

Bridge of Weir Community Council (2065)

A site not appraised in the LDP process is a small site lying to the north of Mill Brae, Bridge of Weir. It has some constraints but could make a small contribution to the plan.

Michael Hopcroft (344)

The proposed housing sites at Fetlar Rd, Maxwell Place, Mill of Gryffe, Bracken Place, Shillingworth and Kilbarchan Road in Bridge of Weir should be removed from the LDP

due to the increased impact from vehicular traffic as a consequence of developing these sites.

Modifications sought by those submitting representations:

No modifications suggested. (204, 1823, 1834, 1858, 1864, 1891, 1916, 2063, 2065, 2105) Paisley South Standard Letter (520 521 522 523 524 525 526 527 528, 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 1775 1790 1791 1792 1793 1794)

Remove Policy P6, it is not required to meet the housing land requirements. (216)

Renfrewshire Council should present to the Examination an assessment of the established land supply to identify those sites which have a realistic potential for delivering housing in the Plan period. The Council also needs to present more information on the delivery of the Action Programme sites. That will provide a clearer calculation of the amount of new land to be allocated in the Plan, and the Council can then put forward its preferences for new sites from those submitted through the call for sites. (2085)

Additional housing allocations require to be identified to provide a continuous 5-year effective supply, ensuring a generous supply and providing a range and choice of sites. The sites should be edge of settlement, greenfield and in a wider range of settlements including the rural villages. (2085)

It is recommended that Table 3 in the LDP is modified, as shown below, to reflect a more realistic view of the housing land supply by using the housing land requirement and effective housing land supply derived by Scottish Government guidance:

Completions 2008- 2012	Effective land Supply at 2012	Established land supply at 2012	Shortfall
2028	2586	845	6341

There is a need for a mechanism to allow the release of additional sites in the event of failure. The following wording has been suggested to remedy this shortcoming:

Amend Policy P2 – Housing Land Supply as follows (italised):

POLICY P2 - Housing Land Supply

The Council will maintain a 5-year supply of effective housing land at all times. The total housing land supply is set out in Schedule 3 and Renfrewshire Council will support development of housing on the sites identified within this schedule which are in line with the spatial strategy set out in this plan. *The housing land supply will be monitored annually through the annual Housing Land Audit. Where a 5-year supply of land for housing is not being maintained at all times, additional land will be released in accord with the criteria set out in Policy P2a - Delivering Sustainable Development.*

A new Policy linked to Policy P2 should be created as described – Policy P2a (or other appropriate policy number) – as follows:

POLICY P2a – Delivering Sustainable Development

Planning permission will be granted for a development proposal including greenfield sites, which is in accord with the principles set out in SPP as long as it can be demonstrated that:

- 1. if the site is greenfield, there is no alternative and available brownfield land in the immediate locality and the site is located at the edge of the existing settlement;*
- 2. the current supply of effective land does not provide a minimum supply of 5 years effective land supply at all times;*
- 3. the approval of the proposal will not materially affect the ongoing implementation and delivery of the development strategy in the approved development plan;*
- 4. the proposal is in accord with the master planning, design and environmental policies set out in the approved development plan;*
- 5. the proposal includes the agreed level of affordable housing (if applicable) required by policy;*
- 6. the proposal is an effective site and evidence of compliance with all technical and other requirements has been provided by the applicant;*
- 7. the proposal is in a location which has spare infrastructure capacity or is self financing in terms of the provision of any upgrade of infrastructure and services by the applicant;*
- 8. the applicant can demonstrate that the proposal is viable in terms of any funding commitments for agreed developer contributions in accord with the provisions of Circular 3/2012 – Planning Obligations and Good Neighbour Agreements.*

Any planning application must provide adequate information and analysis to demonstrate compliance with the above requirements to the satisfaction of the planning authority. New development shall be focused in the Strategic Investment Area, as defined by the Spatial Diagram in the LDP. Planning permission will not be granted for proposals which would undermine the approved development strategy and do not accord with the principles of sustainable development. (186, 2112, 2114)

The housing land requirement within the Proposed LDP should be increased in line with Homes for Scotland guidance and should be shown as between 6193 and 7430. The housing land supply shortfall should also be adjusted and shown as between 4216 and 5473.

In order to address the likelihood that there will be a shortfall in the housing land supply, Policy P2 should be augmented as follows :

“.....The housing land supply will be monitored annually. In the event that a 5 year supply of effective housing land is not maintained, additional land will be released via planning applications to augment the deficiency.” (12)

Amend Schedule 3 to indicate 264 units for the former St Mirren Park, Love Street, Paisley. Add site to proposals map indicating it for residential use. (1829)

Amend Schedule 3 (effective land supply) to read Fordbank Stables, Beith Road Johnstone to have an effective capacity of 57 units and Schedule 3 (established land supply) to have more capacity than 73 units in total.

Identify site (ref. no. 0060) as a small scale residential site for no more than 3 houses in

<p>the LDP. (1817)</p> <p>Remove the sites at Fetlar Rd, Maxwell Place, Mill of Gryffe, Braken Place, Shillingworth and Kilbarchan Road in Bridge of Weir from Schedules 1, 2 and 3. (344)</p>
<p>Summary of responses (including reasons) by planning authority:</p>
<p><u>Existing housing land supply (Paisley South Standard Letter & 511, 1834, 1858, 2063)</u></p> <p>Over the past 20 years development on brownfield land has made a significant contribution to the number residential units built within Renfrewshire. In the preparation of the proposed LDP all potential housing opportunity sites were identified through a number of sources, including through the Suggestions for Land Use Change process along with the Johnstone South West Charrette, and each parcel of land considered suitable for residential development following assessment was identified in the proposed LDP. A large number of the sites contributing to the housing land supply are on brownfield land. However in totalling up all available brownfield land which is suitable for residential use within Renfrewshire this alone does not meet the housing need and demand for the area, and nor would it provide a generous and effective housing land supply in accordance with Scottish Planning Policy (SPP) (CD/03).</p> <p>There are a number of brownfield sites that are found primarily in Renfrewshire's urban towns. These sites are important in augmenting strong communities within Renfrewshire's existing places. Most of the existing brownfield sites are located in the middle of residential areas. These are sustainable sites, well connected to existing services, facilities, infrastructure, etc and are considered good housing sites that should be included as part of the effective and/or established housing land supply.</p> <p>The regeneration of previously developed land is promoted within Scottish Planning Policy (CD/03), the National Planning Framework (CD/19), the Glasgow and the Clyde Valley Strategic Development Plan (GCVSDP) (CD/02) and the spatial strategy and core principles set out in Renfrewshire's Local Housing Strategy (CD/39) and proposed LDP. However a housing land supply consisting of brownfield land only would fail to provide a range and choice of effective housing sites which would be contrary to national policy and would also put the proposed LDP at risk of failure. Furthermore it is considered that only identifying brownfield land would significantly conflict with the Scottish Government's aspirations of delivering sustainable economic growth and supporting investment. By introducing new green belt release sites for housing across Renfrewshire, this has the potential to bring additional people into the area, helping to sustain and potentially increase population within Renfrewshire, in line with the optimistic growth scenario as set out in the GCVSDP(CD/02). Along with this is the potential for an increase in money being spent in the local area, helping the local economy. It is considered that the spatial strategy as set out in the proposed LDP is the correct one, aiming to provide balanced outcomes between sustainable economic growth and protection of the environment.</p> <p><u>Identified housing land supply (186, 204, 216, 1810, 1823, 1883, 1891, 1980, 2085, 2104, 2112, 2114)</u></p> <p>The proposed LDP provides housing opportunities in a range of locations, on different sites within sustainable locations. It promotes a generous mix of housing sites within or directly adjacent to communities where there is an adequate range of existing facilities and services to allow development sites to integrate well. A land use consideration</p>

planning sustainability assessment (CD/06), strategic environmental assessment (CD/7), a landscape assessment (CD/08) along with consultation at the pre Main Issues Report stage and the Main Issues Report stage were used in our assessment of sites. These were used to identify the most suitable locations to deliver the housing land requirements. We welcome Glasgow City Council's comments that the identified housing land supply meets the requirements.

In accordance with the GCVSDP (CD/02), the LDP is required to allocate land and provide a policy framework to deliver an optimistic growth strategy. The proposed LDP identifies both brownfield and greenfield land to meet at least a 10 year supply of housing land. The range and choice of sites provided across Renfrewshire should ensure sufficient flexibility to deliver the housing requirements.

Criticism has been made in relation to assuming that the entire effective and established land supply will be developed in full by 2025. The proposed LDP shows that along with the identification of the green belt sites, Renfrewshire would have a generous land supply for housing to 2025. The sites identified within the established land supply would not be included within the housing land audit, as agreed by Homes for Scotland, if we did not consider that these sites were capable of becoming effective. When preparing the housing land audit for 2012 some sites that were not considered as capable of becoming effective dropped out of the audit and were put into urban capacity and other sites which on their own without any interventions or support were removed from the audit but identified as Housing Action Programme sites. Therefore we consider that with further action to remove constraints from sites in the established land supply and those identified as Housing Action Programme sites that we have complied with SPP (CD/03) and meet the housing land requirements.

It is agreed that the figures in tables 3 and 4 of the proposed LDP setting out the total established land supply from the Renfrewshire Housing Land Audit 2012 (CD/38) are now out of date. Discussions between Homes for Scotland and the council regarding the housing land audit for 2012 were still on-going when the proposed LDP went out for consultation on the 14 January 2013. An agreed audit position has now been reached and the overall established land supply remains at 7939. However based on discussions with Homes for Scotland, the effective land supply within Renfrewshire has been reduced from 3070 as stated in the proposed LDP to 2064. Given the current financial situation and taking a view of whether certain sites will be delivered in the next 5 years, over 1000 units were taken from the effective land supply and put into the established land supply. This may suggest that the housing land supply is now deficient in terms of effective land. However, as shown in the addendum (CD/40) to the background paper on housing land requirements (CD/41), when averaging out the effective sites identified in the housing land supply along with the additional green belt sites identified in the proposed LDP, there is still on average an effective supply of private sector housing at around 450 to 550 units each year. These figures are just slightly below the average house completion figure of 620 from the year 2000, but are almost double the annual completion level since the start of the challenging economic times in 2008. Given the current economic circumstances, the proposed LDP presents an adequate amount of land to meet the current demand (current effective land supply plus the additional green belt sites) and has a significant land supply post 5 years when it is anticipated that there will be more positive signs in the economy and therefore the demand and ability to deliver an increased supply of houses, and continuous effective 5 year supply.

The proposed LDP is in accordance with SPP (CD/03) in that it will maintain a 5-year

effective land supply at all times. Homes for Scotland, in their assessment of the council's housing land audit (CD/38), state that the land supply which is known with some certainty to be effective / deliverable would be 5607. The Renfrewshire Housing Land Audit 2012 (CD/38) shows that the average private sector completions for the last 5 years (2007 – 2012) were around 434 units with a total of 2169 completions. Before the start of the economic downturn, the number of private sector completions in Renfrewshire amounted to an average of 494 units and a total of 2469 completions (2002 – 2006) and 616 average completions with 3080 houses built (1997 – 2002). The total housing completions in Renfrewshire from 2002 to 2006 averaged at 648 units, a total of 3241 completions with that figure reducing to an average of 560 units completed from 2007 to 2012, 2804 units completed in total. Therefore in looking at the trends since 2001, the effective sites indicated in the audit along with the additional green belt release show that there will be enough land indicated to maintain a 5 year supply of housing land.

In terms of the SDP(CD/02), the identification of green belt release sites to provide development in the short term accords with Strategic Support Measure 10 in that flexibility has been built into the housing land supply to support development sites to come forward. The SDP (CD/02) stated that there was more than sufficient effective and established land supply within the Glasgow and Clyde Valley area to meet the demand in the private sector 2025. However the SDP (CD/02) recognises that given the degree of uncertainty in the current housing market and the availability of public subsidy that local authorities may require additional flexibility to plan for housing, particularly over the short term to 2020. Renfrewshire Council considered that there was a shortfall in its effective land supply and this is why green belt land was brought forward. In relation to the programming of effective housing sites indicated in the housing land supply, it is recognised that the programmed output for private sector completions for the next 5 years averages around 350 units, the additional green belt release will boost these numbers and provide on average 450 – 550 units per year.

The council considers that there is also a degree of flexibility built into the identified housing land requirements given that the Glasgow and the Clyde Valley (GCV) housing need and demand assessment (CD/37) used figures presented in the 2009 Housing Land Audits, when the private sector housing completions within Renfrewshire were at 635 units whereas current private sector completions are around 280. The GCV need and demand assessment presents an optimistic growth scenario with challenging housing targets for the local authority to meet. The Renfrewshire proposed LDP sets out how it will provide adequate land to meet these challenging housing targets.

It is considered that the proposed LDP provides a supply of sites which are capable of development during the plan period, which includes sites being delivered over the next two years. So far as the latter is concerned, for almost all of the sites put forward for green belt release, the council have held pre-application discussions with a number of developers wanting to proceed with the submission of a planning application prior to the conclusion of an examination into the plan. This provides a positive indication that these sites will be delivered early in the lifetime of the plan.

It is also considered that the sites identified as effective can be developed without the requirement for substantial front-end infrastructure. In accordance with Planning Advice Note (PAN) 2/2010 (CD/42), as well as the government's general emphasis in choosing development sites which will not require a significant amount of investment in infrastructure, services and facilities, it is considered that the proposed LDP has identified sites which can be developed quickly without major infrastructure interventions being

required. This has been confirmed by the developers by providing additional information at various points in the development plan process and also through consultation work with key agencies and service providers.

There is also an obligation on the planning authority to provide a generous housing land supply, over and above the requirements of the need and demand assessment. The council consider that they have met this requirement within the proposed LDP. The Paisley South Expansion Area is required to contribute to the provision of a generous supply of land in accordance with Scottish Planning Policy (CD/03). The plan acknowledged that the established land supply together with Housing Action Programme sites were insufficient to meet the requirements for a generous housing land supply. Therefore additional land through the release of green belt sites was required. The 9 green belt sites (Policy P3) together with Paisley South Expansion Area provides this generous supply by a margin of 8.5%. Early work has commenced in looking at how this site will be brought forward to contribute to the housing land supply in the medium to long term. The position regarding Paisley South is clearly outlined in Issue 39.

Delivery of the sites identified as Housing Action Programme sites will be challenging due primarily to the current state of the economy and restriction on private sector finance. There are other issues associated with the delivery of some of the sites and these are highlighted in the LDP Action Programme (CD/01). It is considered that many of the constraints are not significant and could be overcome. The council has commenced work analysing various mechanisms and approaches to support development of Housing Action Programme sites as well as sites in the established land supply which includes undertaking investigative works on these sites to provide greater certainty for developers, enabling the implementation of infrastructure that would be required as part of site implementation works for sites, staggering capital receipts on land owned by the council on the basis of a licence agreement or an agreed payment structure and disposal of sites at nil value. Each site may require a different method of support or facilitation and we have already compiled a matrix of the potential requirements for each site, priorities, timescales and potential solutions. We hope to be in continual discussion with Homes for Scotland and other partners to progress these sites. All of the relevant information related to the Housing Action Programme sites will be detailed and set out in Action Programme update reports, but the early work already undertaken by the council will be documented in the housing addendum report (CD/40).

Two sites out of nine of the green belt release sites and the majority of those listed in the Housing Action Programme sites are publicly-owned sites. It is considered that these sites are important sites within or on the edge of settlements wherein their development would have a positive outcome for communities. Many of these sites are vacant or derelict, some with existing buildings in varying states and others where the buildings have been demolished and the site grassed over. These sites have a negative impact on the overall character and amenity of the visual environment. Even where the sites have been greened, the overall form of the built environment seems disjointed and there is a lack of cohesiveness which has an impact on the overall community. By developing these sites the council considers that this could enhance the character and amenity of areas, helping to sustain communities and promote positive additions to existing places rather than removal and demolition of the fabric of the built environment. Their deliverability and effectiveness has been assessed. This work has been included in the updated addendum (CD/40) to the Housing Background paper to explain and provide evidence of the assessment work carried out by the council.

It is recognised that by including a number of brownfield sites to deliver the housing land requirements there is an element of risk that an adequate amount of houses will not be delivered each year. Nonetheless the council has taken a balanced approach to this issue. The council is well aware that it requires to increase its efforts in partnership working, applying smarter working practices in promotion and marketing of sites, especially given the current financial situation. As outlined above, the council proposes to adopt/implement new mechanisms and approaches for delivery of sites which are constrained simply by the current market conditions as detailed in the LDP Action Programme. We will aim to show potential developers how the sites identified as capable of becoming effective can be made effective thereby providing a continuous supply of housing sites. Details of the verification exercise that has been undertaken by the council have been provided through an addendum to the background paper.

In accordance with the advice from the Scottish Government, it is considered that Renfrewshire's Proposed LDP is succinct and an easy to read document. It was not considered appropriate to provide all of the detailed evidence on housing assessments within the plan and the use of background papers provides the detail. With hindsight, we would agree with a number of the respondents that fuller information in relation to delivering the housing land requirements should have been presented in Background Paper 3 – Housing Land Requirements (CD/41). However a complete and comprehensive assessment was undertaken for all housing land in the preparation of the plan. Accordingly an addendum (CD/40) to the background paper on housing land requirements has been prepared detailing that process and the council's approach to the delivery of the housing land supply.

If a significant number of additions were made to Schedule 1 and/or 2 in the plan in line with various representations made (summarised above), we consider that the focus on development of the many brownfield sites within Renfrewshire would be prejudiced. The proposed LDP aims to facilitate an increase in the efforts being made to regenerate areas, through development briefs to encourage good quality design-led development. Placemaking is a key policy principle in the Proposed LDP that is important within our communities. The addition of more green belt sites to Schedule 1 and/or 2, would simply dilute the focus of sustaining and enhancing existing communities through regenerating areas.

The suggestion that the council is reliant on the Community Growth Areas at Bishopton and South West Johnstone in meeting the housing land requirements is not accurate. In the 2012 housing land audit (CD/38), the programming for both these areas has been scaled down significantly to reflect a maximum of 25 units per year per housing developer. Therefore the plan is realistic in what can be delivered at both these sites as well as the timescales for delivery.

Renfrewshire Council considers that the assessment of the effectiveness of the land to meet the housing land requirements is comprehensive and that there is no requirement to identify further land for private sector housing.

Maintaining a 5 year effective land supply (12, 186, 1864, 2085, 2095, 2112, 2114)

It is recognised that the housing land audit alone does not demonstrate that there is a 5 year supply of effective land. Short term green belt release across Renfrewshire and a proactive approach to bringing sites forward which are capable of becoming effective in

the next 5 years, and supporting them to be effective is required to ensure a continuous supply. It is considered that a sufficient number, range and choice of sites have been identified to satisfy the housing requirements in the lifetime of this plan.

The council considers that there is good reason to identify a large proportion of the housing land on brownfield sites, in particular given the large amount of vacant and derelict land that is available within Renfrewshire. To do otherwise would conflict not only with the proposed LDP but many of the council's other plans, strategies, policies and objectives, such as Renfrewshire Council's Single Outcome Agreement (CD/43), the Community Plan (CD/44), the Council Plan (CD/45) and the Local Housing Strategy (CD/39).

The release of further housing sites on the scale requested by the respondents would lead to a substantial depletion of green belt around many of Renfrewshire's towns and villages, and would place a significant strain on existing services and infrastructure. The ability of the development industry to contribute to necessary upgrades and the provision of new infrastructure is considered a risk and the council would not want to see development having an adverse impact on our existing communities.

To provide a mechanism in the plan should the housing development strategy underperform is not considered appropriate in this plan given that the LDP will be continually updated every 5 years. In accordance with Planning Advice Note 2/2010 (paragraph 42) (CD/42), the annual housing land audits are important as they reflect the changing nature of housing markets and market conditions. The housing land audit ensures that the forecasts for the estimated house completions over the next 5 years period remain robust and realistic. The council considers that it would be difficult to indicate or provide an appropriate timeframe or point in the lifetime of the LDP within which an assessment could be carried out to identify whether or not the housing land supply is underperforming, particularly in the current economic circumstances. Furthermore it is considered that by having such a mechanism in place this would lead to confusion in the development plan process given that the release of additional sites due to underperformance is likely to occur at the same time as the Main Issues Report stage where more potential housing development sites are being submitted, assessed and put out for consultation for LDP2. It is considered that there is continual monitoring work which is carried out each year to complete the housing land audit where the assessment of the effective and established land supply is undertaken. The next Suggestions for Land Use Change process is likely to commence early 2015 with the Main Issues Report being put out for consultation towards the end of 2015. At this stage all housing sites in the housing land supply will be assessed in terms of completions, potential future build and programming. Therefore we see that a policy mechanism in the plan doesn't serve any additional purpose than the constant review of the LDP.

The council is committed to supporting delivery on a range of sites and is obliged by policy and statute to provide sustainable sites, regenerate previously developed land, reduce greenhouse gases, provide sites which have limited infrastructure requirements and which are close to existing services and facilities. We consider that a number of the housing development sites outlined in the proposed LDP comply with these obligations given that they are located in the middle of urban areas.

Generosity (186, 1864, 1883, 2112, 2114)

In accordance with Scottish Planning Policy, the proposed LDP allocates a generous

supply of housing land. The plan identifies housing land to accommodate the housing land requirements, plus a margin which equates to just below 10% generosity. While the latest draft SPP (CD/46) indicates that the Scottish Government may favour generosity provisions of between 10-20%, this is not a fixed requirement. The council has adopted a lower end generosity level because the housing supply targets identified in the Local Housing Strategy (CD/39) are significantly above the average private sector completions for the last 10 years. Private sector housing completions rates of 745 units and above has only been reached 6 times since 1991. This reflects the “generosity” which was built into the SDP figures. Therefore the housing supply targets are ambitious and that is why the council has adopted a figure generosity figure at the lower end of the scale.

General

Persimmon Homes (West) Scotland (186), Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112), Cala Homes (West)(2114)

At the point of going out to consultation on the proposed LDP, the housing land supply through the housing land audit had not been agreed with Homes for Scotland. However since then the agreement has been reached.

Homes for Scotland (2085)

The proposed LDP identifies the housing requirements across all tenures. It is agreed that the split between the private sector housing requirements and affordable is not specifically detailed. If the reporter was so minded, an addition to the plan could be inserted at Table 1 setting out the private and affordable sector requirement.

The affordable housing supply target was set in Renfrewshire’s Local Housing Strategy (CD/39) and these targets are translated into the scale and distribution of the housing land requirements in the proposed LDP. Given the past successes in delivering around 180 affordable units per year over the past 5 years and future agreed funding through the Strategic Housing Investment Programme (CD/04), it is considered that lower, less ambitious targets, would be inappropriate. The challenging funding climate for affordable housing is understood. However the council continues to look at innovative methods of providing affordable products, and considers that these targets can be achieved.

Stewart Milne Homes (1883), Persimmon Homes (West) Scotland (186), Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112), Cala Homes (West)(2114)

As highlighted above, the assessment work detailing the methodology and process to identify the land put forward to meet the housing land requirements has been undertaken. It is evident from some of the consultation responses to the proposed LDP that Background Report 3 – Housing Land Requirements (CD/41) did not provide a comprehensive explanation and evidence trail regarding the housing assessment work. This work had been undertaken and the addendum to the housing background paper (CD/40) provides more detail of this.

Stewart Milne Homes (1883),

The council did not ignore all of the useful input to the development plan preparation from

pre-MIR and at the MIR stage. In fact the additional information received greatly informed the plan. We also dispute the alleged lack of transparency in the process as the council have aimed to document and provide an explanation on all parts of the process as well as continue to meeting with interested parties as the preparation of the LDP progressed. The council have complied with that outlined in the Participation Statement of the Development Plan Scheme (CD/47).

Councillor Paul Mack (2105), Mary Mungin (1916)

Scottish Planning Policy (CD/03) requires that development plans are informed by a robust housing need and demand assessment (HNDA). Renfrewshire Council worked in partnership with the 7 other local authorities within the Glasgow and the Clyde Valley SDP area to produce an assessment which was considered robust and credible by the Scottish Government. The preparation of this assessment took over two years and a significant amount of work undertaken to ensure that the results were well evidenced. Unfortunately there was no summary version of the HNDA produced, but the final Glasgow and the Clyde Valley SDP notes the important conclusions from the assessment which require to be translated into local housing strategies and local development plans. It is recognised by the Scottish Government and many others that it is a complex assessment and for the next round of development plans the government has produced a toolkit to ensure a consist approach to the HNDA using a simplified methodology. It is hoped that this will be more straightforward and easier for all to understand.

Tesco Stores Ltd (1829)

Schedule 3 identifies 60 units at the site of the former St Mirren Football Club. This figure has been agreed with Homes for Scotland as the effective supply at the site. The remainder of the potential residential units at the site are within the established land supply within Schedule 3. There is no need to alter schedule 3, as we considered it very unlikely that 264 units at this site will be built in the next 5 years.

The site is zoned as P1 in the proposed LDP given that the site has consent for residential use and is considered as part of the urban built up area The site is listed in Schedule 3 as an identified housing site which is part of the housing land supply. There is no requirement to alter the proposals map.

Mr Gordon Cullen (517)

In relation to the site at Fordbank, Beith Road, Johnstone, Schedule 3 (effective land supply) reflects what was submitted (CD/48) to the planning authority at the time of going out to consultation on the proposed LDP. If the reporter was so minded, Schedule 3 could be updated to reflect the current planning submission (CD/48) for the site and replace the currently stated 48 units with 57 units. In relation to the request to alter the figure of 73 units that is stated in Schedule 3 (established land supply), it should be noted that the site has capacity for 121 residential units. The 48 units in the effective land supply leaves the balance of the capacity of 73 units which adds up to the total capacity of 121 units for the overall site. These figures have been agreed by Homes for Scotland and it is considered that the total capacity of the site should remain as 121 units. If the reporter was so minded, Schedule 3 (established land supply) requires to be changed from 73 units to 64 units to reflect the current situation at the site.

Granite Properties (1817)

There are a number of small sites in and around Johnstone, which are identified within Schedule 3 of the proposed LDP. It is considered that there is a good range and choice of sites in and around Johnstone and there is no requirement for additional sites in this area.

Bridge of Weir Community Council (2065)

The site to the north of Mill Brae in Bridge of Weir is within the Housing Land Audit 2012 (CD/38) and has been considered. All of the existing sites within the housing land supply have been assessed to establish the likelihood of development and potential timescales. This site is not expected to be developed in the next 5 years and is considered as part of the established land supply.

Michael Hopcroft (344)

All of the sites outlined by the respondent, apart from Shillingworth, have planning consent. The number of residential units proposed adds up to 70 units which is unlikely to have a significant overall impact on the existing road system or junction capacity as a result of development.

Reporter's conclusions:

Brownfield, Greenfield and green belt sites:

1. The presumption in Scottish Planning Policy (SPP) is that development will be directed towards sites in existing settlements where possible to make effective use of existing infrastructure. Brownfield sites are preferred to greenfield sites. This is reinforced by the Glasgow and Clyde Valley Strategic Development Plan (SDP) and is a particular focus of the proposed plan. In Renfrewshire however, brownfield and other urban land which is suitable for residential development will not meet, on its own, the housing need and demand, nor would it provide the generous and effective housing land supply required by SPP. This is partly because some of the brownfield land is not considered to be effective.
2. The council has initiated a housing action programme to address stalled and difficult sites. I acknowledge that there will be difficulties making some sites ready for occupation in the lifetime of the plan because there are particular constraints to be overcome first. Many sites need investigation work to be carried out, but the council is considering innovative approaches, as encouraged to do by the Scottish Government. This supports the focus on development of previously used sites, to ensure there is a generous supply of land in the right places.
3. The release of further greenfield sites could discourage the focus on brownfield housing land. Where such sites are in the green belt, development could harm the purposes of its designation. The planning authority takes a positive approach to working with the house building industry and is prepared to be flexible in support of the housing action programme. The planning authority has assessed each site and makes a reasoned case for the effectiveness of each, including what needs to be done to make sites effective in the future. In the meantime, some greenfield land will be required to maintain a supply of effective land.
4. The Strategic Greenbelt Review of 2012, a background paper to the proposed plan,

recognises that a limited release of green belt land was not essential in terms of the quantity of future development land required during the lifetime of the plan, but desirable to provide increased range, choice and generosity, and thereby provide the flexibility sought by the Scottish Government. In the light of my conclusions on effective land supply, it is likely that there will be further pressure on green belt land. Even if the green belt land were not required numerically, the flexibility it provides at a diverse range of relatively small sites should enable more housing to proceed, particularly in the early years of the plan. That would help meet housing need and demand, but would also contribute to sustainable economic growth, the central purpose of the Scottish Government. I do not therefore consider that only brownfield land should be allocated for housing. The plan should not be modified in that regard.

5. The reporters have dealt with Paisley South Expansion Area proposal under issue 39 and the assessment of specific housing sites, including those proposed in the green belt, under issues 19 to 36 inclusive.

Housing land supply numbers and generosity

6. The expectation in SPP is that the planning system should identify a generous supply of land for the provision of a range of housing in the right places. It also expects the proposed plan to allocate a range of sites which are effective or capable of becoming effective to meet the housing land requirements up to 10 years beyond the predicted year of plan adoption, ensuring a minimum of 5 years effective land supply at all times.

7. For Renfrewshire, and derived from the housing needs and demand assessment (HNDA), the SDP includes an indicative requirement for all-tenure housing of 11,800 units between 2008/09 and 2025. According to the SDP background paper on housing land requirements, these have been prepared with optimistic projections, the incorporation of backlog need and discounting windfalls to produce a generous land supply. The Scottish Government considers that the HNDA is robust and credible and the approach taken does not therefore need to be examined here. The SDP says that the housing land requirements, based on the HNDA, are generous. The planning authority accepts the numbers. SPP says that the delivery of housing depends on a generous supply of land. It is therefore clear to me that the proposed plan should include an element of generosity beyond the amount of land needed for the SDP numbers.

8. The proposed plan says that sufficient land has been identified as effective or capable of becoming effective to meet the housing land requirement up to 10 years from adoption, in accordance with SPP. It says that the private sector requirement of 11,000 taken from the SDP will be made up from 2028 completions + 3070 effective land supply + 4869 established land supply + 1833 allocations.

9. Representations have challenged the accuracy of these figures and the planning authority acknowledged that they are now out of date. Having initially sought a correction of the figures in writing, I then held a hearing session in February this year to discuss housing land supply with the council and those who had made relevant representations on the matter. The council supplied new tables for the proposed plan. These show a revised figure for house completions (1,393), effective land supply (2,064) and established land supply (5,875). Taking these from the overall requirement of 11,800 leaves a shortfall of land for 2468 housing units. To meet that, the council proposes that a housing action programme, to make stalled and constrained sites effective, will deliver 1414 units, additional sites identified in the proposed plan will provide 543 and the

proposed Paisley south expansion a further 1,000. That would give a total 489 units above the SDP requirement.

10. Representations suggest some minor adjustments to the figures. The council's amended figures include the increase in houses at the site at Fordbank, Beith Road, Johnstone, which has a planning permission for 57 units rather than 48. At St Mirren Park, Love Street, Paisley, numbers do not need to be amended because they do not add to the effective supply.

11. The parties to the hearing session agreed that the 2012 housing land audit is the starting point, although I note that this only presents a snapshot at a particular moment in time. The assessment and capacity of sites is also agreed. Homes for Scotland says that this leads to a land supply for 1,052 units along with 964 affordable housing units which leads to an 11,016 total land supply. That would be 784 short of the 11,800 required by the strategic development plan.

12. Since the proposed plan was submitted for examination, the housing land audit for 2013 has been prepared. This includes the sites allocated in the proposed plans. It provides another snapshot of the housing land supply in Renfrewshire. As the most up to date evidence, it could be used as the basis for calculating land supply, however, it has not been agreed with Homes for Scotland and therefore may not be as helpful as intended. I have therefore not used the draft audit here.

13. The proposed Paisley South Expansion Area would provide a notional 1,000 units in the long term. The council says that would be a margin of 8.5% generosity over the SDP requirement of 11800 units. Renfrewshire Council explains that this is at the lower end of the proposed generosity range in the draft replacement SPP. However, that is not the only option in the draft SPP and that document is now being reconsidered following a period of consultation. The Scottish Government's position statement of January this year indicates that there may be policies to define a generous supply, to encourage assessment of windfall contributions and identify the 5 year effective supply. All these would have an impact, particularly on development plan preparation. They remain uncertain, however and the draft SPP consequently attracts little weight for now. The level of generosity proposed would be consistent with the current SPP in my view.

14. Notwithstanding the above, I have found under issue 39 that the proposed Paisley South Expansion Area can be kept within the proposed plan, but should not be included in the housing supply at this stage because it is only a possible long term expansion which still needs to be investigated and therefore cannot be considered effective. Without the 1,000 homes estimated for that area, the proposed plan would not allocate sufficient land for up to 10 years from adoption, whether or not I accept the figures from the council or Homes for Scotland.

Maintaining an effective 5 year supply

15. For the purposes of this assessment I have assumed that the plan will be adopted sometime in 2014. The effective 5 year supply will therefore need to be provided initially until 2019.

16. The council's local housing strategy 2011-2016 is a statutory document which shows how the housing needs and demands will be met. It sets a private sector housing supply target of 895 for each of the 5 years to 2016 and 782 for the following nine years to 2025.

These are based on an optimistic level of population growth. The approach is consistent with the SDP. For the 5 years following adoption of the proposed plan in 2014 that would come to 4,136 units (equivalent to 2 years at 895 and 3 years at 782). For the hearing session, the council and Homes for Scotland agreed that the 5 year effective requirement is 3,775 units, equivalent to 755 per year.

17. Homes for Scotland, together with house building companies and land owners represented at the hearing, arrive at different figures for effective supply. This is because they have programmed delivery less optimistically than the council. In general terms, their view is that some sites will not be ready for houses to be built as quickly as the planning authority thinks. The council's figures indicate an effective supply of about three-and-a-half years. Homes for Scotland (in consort with some house building companies) indicate around two-and-a-half years.

18. I am inclined to look at the projections optimistically for two reasons. Firstly, the need and demand figures handed down from the SDP are based on optimistic growth assumptions. Secondly, the downturn in the economy which has done much to stifle house building for the last five years (or so) is showing signs of recovery. So, accepting the council's figures would mean an effective supply of 2,506 homes at the start of the plan period, set against a requirement for 3775. That would be a shortfall of 1,269 units. Taken with my finding on the 10 year supply, the proposed plan does not identify sufficient land on a range of sites which is effective or capable of becoming effective to meet the housing land requirement up to year 10 from adoption, ensuring a minimum of 5 years effective land supply at all times. To provide the flexibility required by SPP, further sites will need to be identified. References in the proposed plan to there being an effective supply will need to be modified.

19. The council draws a distinction between the targets and what can realistically be built. There would be sufficient land allocated in the proposed plan for the required number of houses overall, but the council's response to the representations includes an effective 5 year supply on the basis of what is likely to be built in that time. House completions over time, monitored annually, can provide an indication of what might be built in subsequent years. On that approach, the council says that completion rates are unlikely to match the targets in the short term. In its background paper addendum (CD40) the council assesses the potential for completions at 450-550 units for each year, and says this is almost double the current private sector completion rates. On that basis, the effective supply requirement would be between 2,250 and 2750 units. That would be around the figure of about 2,500 which the council presented to the hearing session as the 2014/2015 effective supply. Although that may give some comfort that there is land available for the likely housing delivery, at least initially, that is not how the SPP requirements should be applied in the proposed plan. With the high level of need and demand, the generous supply is needed to provide a range and choice of sites so that development of houses is not constrained.

20. Having identified a shortfall in housing land, I now consider what may be done to resolve it.

21. In our examination of the proposed plan we have looked at the additional housing sites proposed by the council and other sites suggested by those who have made representations. Our conclusions can be found under issues 19 to 36 inclusive. The council has assessed the effectiveness of housing sites using the seven criteria in PAN 2/2010. We have assessed each site objectively on its merits in relation to the spatial

strategy for the proposed plan. The result of this exercise is that we consider that the wider supply deficiency cannot be changed without a reconsideration of the proposed plan's strategy overall. We have however identified some sites which we consider could be allocated now. These are at Station Road, Bishopton (issue 25); Lawmarnock Road, Bridge of Weir (issue 26); and Northbar, Erskine (issue 28). These sites would add 259 units to the effective supply. But a shortfall of around 1,000 units would remain.

22. The parties to the hearing session agreed that the shortage of effective sites is in the early years of the proposed plan. Some sites put forward are for substantial numbers of housing phased over a number of years. Others are promoted by developers with existing sites in the housing market area and who might have limited resources to progress a number of sites more quickly. It is therefore not certain that allocating large areas of new land for housing will solve a short term supply problem. At the hearing session I heard that the number of houses being built has gone down in recent years. Difficult economic circumstances have reduced the market. There is little point in developers building houses they cannot sell and landowners are reluctant to part with land at a reduced price. It is unlikely that funders will be prepared to lend money when a return is unlikely. However, none of that prevents the council from allocating sufficient land in accordance with the SDP to meet the housing need and demand. The release of additional land should increase the range of developers in the market and increase competition for land value, which should benefit those hoping to buy. As has been suggested in representations, the inclusion of smaller sites would help to diversify supply and overcome the slow build-out rate of some of the larger sites.

23. At the same time, it is likely that in an improving economy, sites currently not considered effective may become so, and windfall opportunities may emerge. Although a site is usually presented as either being effective or non-effective, any non-effectiveness will rarely be permanent. The effectiveness of a site will vary in response to physical and economic factors, which will be subject to change.

24. The promoters of greenfield sites point out that the key to effectiveness of a site is its location in relation to market demand. This is at odds with a council strategy that seeks to regenerate urban areas first and limit green belt sites next to rural villages. There is no great surprise here; the urban areas need to be a focus because the market shies away from them. SPP promotes housing in the right places and says that the planning system should enable the development of housing in sustainable locations.

25. The possibility of identifying sufficient land using supplementary guidance was considered at my hearing session on housing supply. In my view, the potential impact of finding sufficient land could affect the spatial strategy of the proposed plan and have significant effects for the environment. It would be contrary to the advice of Circular 06/2013 to require identification and allocation of probably contentious housing sites without the scrutiny of an examination.

26. Another option discussed at the hearing session was the modification of Policy P2 to include criteria for assessing sites coming forward to bridge the gap between the land required for an effective 5 year supply and the under-allocation in the proposed plan. Specific policy support for further greenfield release could undermine the focus of the proposed plan on brownfield land. For all of these reasons, the detailed policy suggested is not needed in the plan itself.

27. However, supplementary guidance could be used to set out a framework for the

release of additional housing land where a shortfall in the maintenance of a five year supply is identified by the annual audit and cannot be resolved with sites in the established supply. It could include the methods the council will use to make housing action sites effective. Specific criteria, as discussed at the hearing session might usefully be included in this guidance. Although using this approach would run counter to the planned system and could encourage speculative green field development at odds with the spatial strategy of the proposed plan, it would enable further sites to be identified in advance of re-assessment of housing land supply by review of the LDP. I therefore consider that the proposed plan should be modified to include that the council will prepare supplementary guidance in the first year of the LDP and monitor and review that guidance annually in the light of changing circumstances.

28. The wording of policy P2, as it is, encourages bringing forward housing sites from those effective and established sites listed in Schedule 3 to the proposed plan. However, this could be made clearer, with a positive policy trigger to link to the recommended supplementary guidance on housing land supply. The intention should be that where monitoring shows a 5 year supply is not being maintained, the council will identify effective land for earlier release. In my recommendation below, I have included additional wording.

29. The council says that the rolling review of the LDP, with suggestions for land use change and a Main Issues Report in 2015 would provide the opportunity for additional sites to come forward. Whilst that would not resolve the short term shortfall in land supply, it will enable a more focussed look in due course and in the light of changing economic circumstances and the forthcoming replacement SPP. That may inform the supplementary guidance in the meantime, but would not provide a suitable mechanism for managing land supply in advance of the plan's review.

30. In conclusion, I have found a shortfall in housing land, contrary to SPP. Whilst that might be cause for an early review, in accordance with the advice of Circular 06/2013, the long and onerous process would not address the short term need. With an optimistic outlook for the economy and the likelihood of increasing effectiveness of stalled sites, I consider that it would be appropriate to adopt the local development plan now, with a revised Policy P2 and associated supplementary guidance to provide a means of identifying appropriate additional sites to meet demand.

Affordable housing

31. Affordable housing targets have been set at almost three times the SDP figure. The affordable housing supply target stems from the Local Housing Strategy. The council considers that the challenging targets can be met, based on previous success. It will be for the council to show how this can be achieved when considering particular sites and their effectiveness. In the meantime, there is no need to modify the proposed plan.

32. The council says that affordable housing figures could be added to table 1 of the proposed plan. I agree with this and a modification of the table is included in my recommendations below.

Other matters raised

33. The sites referred to in and around Bridge of Weir all have planning permission with the exception of Shillingworth (which is considered at issue 22 below). Traffic impacts

are a matter for planning applications. However, I see no reason to disagree with the council's assessment that significant impacts are unlikely. The sites need not be removed from the proposed plan.

34. The representation from Glasgow City Council (204) is not an unresolved representation and therefore does not need to be addressed in this report.

Reporter's recommendations:

1. On page 26, under the heading 'Additional Housing Sites', remove the first sentence of the second paragraph (which begins 'By identifying...').

2. On page 27 under the heading 'Housing Land Requirement', replace the second paragraph with the following:

'The council recognises that a five year effective supply of land for housing, as set out in Scottish Planning Policy, will not be provided at the start of the plan period. The council will investigate the potential for further release of land and prepare supplementary guidance to ensure an effective and generous supply. The land supply will be monitored through annual housing land audits and where the 5-year supply is not being maintained, further land release will be considered against the detailed criteria set out in that supplementary guidance.'

3. Include the affordable housing targets as a separate column in table 1 on page 27.

4. Provide up to date figures for table 3 on page 27 as supplied to the examination.

5. Adjust the figures in table 4 (on page 27) and Schedule 2 (on page 30) to include allocations recommended in issues relating to specific sites and to delete the contribution estimated for the Paisley South Expansion Area.

6. Modify Policy P2 – Housing Land Supply by adding the following:

'The council will prepare supplementary guidance within 1 year of adoption of this plan to include a detailed framework to guide the release of additional housing land where a 5-year supply of effective housing land is not being maintained. This guidance should be subject to annual monitoring and review. The council will grant planning permission in accordance with the detailed guidance, provided that:

- the site is shown to be effective and can be delivered to address the identified shortfall;
- it will not undermine the spatial strategy of the plan; and
- its design would comply with the criteria for implementing the spatial strategy on page 6 of this plan and the council's New Development SG.'

Appendix 1: Body or person(s) submitting a representation raising the issue of Paisley South (including reference number). **Note: some of these have since been withdrawn.**

<p>Craig Millar (520) Marian McCallum (521) Audrey McGeoch (522) Dorothy Bannatyne (523) Dorothy Kerr (524) Allan W (525) J Taylor (526) W Watson (527) David McGruther (528) Janis Wilson (530) Frances Bryce (531) Fiona Herron (532) Evan Willas (533) June Cunningham (534), A Korabinski (535) Alex Morrison (536) E Hislop (537) Janette Russell (538) Elaine Marquis (539) Jamie Borland (540) Ryan Wallace (541) Betty Clark (542) James Bolland (543) Stephen Fairbairn (544) Dr P Fletcher (545) John Bolland (546) Katrina A Gelston (547) Marie Meechan (548) J Carslans (549) Hannah McIntyre (550) Jordon J Crawford (551) Craig Devine (552) David Nicol (553) P Haldane (554) Elspeth Smith (555) Dr Donald Winton (556) Oliver Moore (557)</p>	<p>Jennifer Reid (558) H J C Cornwell (559) Phil Dawson (560) Jane Cornwell (561) Marian Boyle (562) Walter Black (563) James & Jane Wardrop (564) Juliette Ralston (565) Ruth Alexander (566) David Fulton (567) Anne Coleman (568) Mrs E Ray (569) Bianca McAulay (570) Mrs C Hamilton (571) H Ballantyne (572) Rev Alistair Cook (573) Mary Findlay (574) Patricia & Andrew Johnstone (575) Evelyn McCall (576), E Hopkins (577) Joyce Wilcox (578) William McConnell (579) S D (580) Raymond Dalglish (581) Shona Kirby (582) John Pirie (583) Richard & June Reid (584) Robert Hamilton (585) Mr J Heriot (586) Patricia Stuart (587) P E McNally (1775) John Naughton (1790) David Kerr (1791) Alan Hutchison (1792) Ian Glen (1793) Margaret Macintyre (1794)</p>
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Issue 18	Policy P3 – Additional Housing Sites	
Development plan reference:	Policy P3 – Additional Housing Sites	Reporter: Dannie Onn
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Standard Letters for Abbey Road, Houston Road and Shillingworth: See Appendix 1 attached.</p> <p>Andrew Forrest Properties (85) James R Macaulay (107) Roger Riach (199) Gail McClory (213) Russell Campbell (217) Martin Dougall (225) Christopher Gresham (229) George Paterson (236) Douglas Russell (239) Julia Doyle (242) Ross Donachie (243) James Henderson (266) Ian Ballantyne (270) Mr Michael McGoldrick (282) Dr Norman Sharp (283) Dr & Mrs Lyons (285) Linda Motherwell (313) Angus Matheson (339) David Lowe (343) Paisley West & Central Community Council (345) Mrs Mary Spalding (386) Mrs Christine Eddy (429) Alexander Wright (435) Councillor Stuart Clark (437) Mr Kenneth Campbell (458) Mrs Jennifer Crawford (489) Walter Reid (502) Vivienne Geddes (503) Carol MacKay (505) Christopher Sherlock-Scougall (511) Gillian Jamieson (1426) RA McGregor (1731) Dr William Manley (1737) Mactaggart & Mickel (Homes) Ltd (1801) Pat McKinnon (1805) Mr W Thomson (1808)</p>	<p>Elizabeth Pringle (1852) Mr A.R. Nicol (1854) Ronald C. McGuire & Margaret McGuire (1855) Ross McMath (1856) William Armstrong (1858) Christine Clark (1863) James Clark (1867) Peter & Marion Kelt (1871) NHS (1876) Gordon Matthew (1881) Mark Dinardo (1884) Omar Mahmood (1885) Mary Begg (1887) Duncan MacIntosh (1891) James Pope (1892) Bob & Elizabeth Meikle (1893) Gerard PA Dolan (1894) Mr Richard Fleming (1898) Mrs Lorraine Fleming (1900) Daniel Mungin (1918) Morvan McLeod (1921) Robert Adam (1937) Paula Adam (1939) David Dunlop (1976) Janet Reid (1983) Iain MacKay (1986) Hugh Meighan (1987) Mr T. Russell (1988) Gillian Graveson (1990) Councillor James MacLaren (1998) JM McGill (2009) Mr M.C. & Mrs J. Lawrence (2010) Councillor Mike Holmes (2013) Houston Community Council (2036) Save Houston Village Renfrewshire Greenbelt (2039) Karen Gilchrist (2042) Councillor Allan Noon (2046) Lorna Dunlop (2048) James Paterson (2049) Ranfurly Castle Golf Club (16) Donald P Hepburn (2058)</p>	

Hawkhead and Lochfield Community Council(1811) Peter J Dixon (1816) Ann & John Cameron (1823) Sandra Barr (1825) Joseph Barr (1831) Robert Todd (1833) J.L. Scaglione (1835) Gordon Keir (1836)	Elderslie Community Council (2059) J&H Ritchie Ltd (2090) Isabella Muir (2092) David Wilson Homes (2095) Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112) CALA Homes (West) (2114)
Provision of the development plan to which the issue relates:	Additional allocated housing sites to meet the identified housing requirements.
Planning authority's summary of the representation(s):	
<p>Consented / Brownfield sites (217, 225, 236, 243, 266, 283, 285, 339, 437, 503, 511, 1426, 1731, 1805, 1811, 1823, 1825, 1831, 1833, 1852, 1854, 1855, 1863, 1867, 1898, 1900, 1921, 1937, 1939, 1987, 1988, 1990, 1998, 2009, 2010, 2013, 2039, 2046, 2049, 2059, 2092)</p> <p>Houston Road, Standard Letter (437, 493, 498, 514, 642, 656, 854, 954, 1026, 1028, 1042, 1047, 1209, 1212, 1213, 1214, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1246, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1308, 1309, 1310, 1311, 1312, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1349, 1350, 1351, 1353, 1354, 1355, 1356, 1357, 1358, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1381, 1382, 1383, 1386, 1387, 1390, 1392, 1393, 1397, 1398, 1399, 1400, 1402, 1403, 1406, 1408, 1410, 1412, 1414, 1415, 1420, 1421, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1431, 1434, 1437, 1441, 1442, 1443, 1444, 1445, 1446, 1448, 1449, 1450, 1451, 1452, 1453, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1480, 1481, 1482, 1483, 1484, 1485, 1487, 1488, 1489, 1490, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 1519, 1520, 1521, 1522, 1523, 1524, 1525, 1526, 1528, 1529, 1530, 1531, 1532, 1533, 1534, 1535, 1536, 1537, 1538, 1540, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1549, 1551, 1552, 1553, 1554, 1556, 1557, 1558, 1559, 1560, 1562, 1563, 1564, 1565, 1568, 1570, 1572, 1575, 1579, 1580, 1581, 1583, 1584, 1585, 1587, 1588, 1589, 1590, 1591, 1593, 1597, 1598, 1599, 1600, 1601, 1602, 1604, 1605, 1606, 1607, 1608, 1609, 1611, 1612, 1613, 1614, 1615, 1616, 1618, 1619, 1620, 1621, 1622, 1623, 1624, 1625, 1626, 1627, 1628, 1629, 1630, 1631, 1632, 1633, 1634, 1635, 1636, 1637, 1638, 1639, 1640, 1641, 1644, 1645, 1646, 1647, 1648, 1649, 1651, 1652, 1669, 1670, 1671, 1672, 1673, 1674, 1676, 1677, 1678, 1679, 1680, 1681, 1682, 1683, 1684, 1687, 1688, 1689, 1690, 1691, 1692, 1693, 1694, 1695, 1696, 1697, 1698, 1699, 1700, 1701, 1702, 1703, 1707, 1708, 1709, 1710, 1711, 1712, 1713, 1714, 1715, 1716, 1717, 1718, 1719, 1723, 1725,</p>	

1726, 1727, 1728, 1729, 1730, 1731, 1732, 1733, 1734, 1735, 1736, 1737, 1738, 1739, 1740, 1741, 1742, 1756, 1763, 1764, 1769, 1782, 1787, 1788, 2106)

There are numerous other development / housing sites within Renfrewshire which have already been given planning consent or areas of brownfield land which could be utilised to protect our green belt areas. If more housing is required then it should be in the multiple brownfield sites, spread across a wider area. Development of brownfield sites would not have such an adverse effect on the environment than greenfield development. These existing housing sites have infrastructure, services and facilities in place to accommodate increased housing and population which cannot be said for the greenfield sites identified in Policy P3. It is wrong to build on green field sites when there are brownfield sites available. Green belt serves as a vital function which can never be recovered once lost. Green belt should only be considered under exceptional circumstances where no alternatives are available. Whilst it is accepted that the council have an obligation to provide land for development, it is not accepted that this needs to be on green belt. Release of green belt sites will work against the strategic planning and regeneration aims stated in the Renfrewshire Proposed LDP and the Strategic Development Plan (CD/02).

Roger Riach (199), Russell Campbell (217), Ross McMath (1856), Mr Richard Fleming (1898), Mrs Lorraine Fleming (1900), Elderslie Community Council (2059)

There are many derelict buildings, brownfield and abandoned sites that could be used in place of agreed green belt areas. The focus should be on transforming these areas into affordable developments, leaving the green belt untouched.

Councillor James MacLaren (1998)

At present there are 42 buildings on the Buildings At Risk register. Pressure should be put on developers to develop these or brownfield sites rather than the easy option of developing greenfield sites.

James R Macaulay (107), Douglas Russell (239), James Henderson (266), Ian Ballantyne (270), Mr Michael McGoldrick (282), Angus Matheson (339), David Lowe (343), Mrs Jennifer Crawford (489), Ann & John Cameron (1823), J.L. Scaglione (1835), Mr A.R. Nicol (1854), Gordon Matthew (1881), Mark Dinardo (1884), Mary Begg (1887), Duncan MacIntosh (1891), James Pope (1892), Bob & Elizabeth Meikle (1893), Gerard PA Dolan (1894), Houston Community Council (2036)

Abbey Road Standard Letter (229, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1100, 1102, 1103, 1104, 1105, 1107, 1108, 1109, 1110, 1111, 1112, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1720, 197, 199, 222, 228, 230, 231, 233, 234, 238, 244, 245, 246, 247, 248, 249, 250, 251, 253, 254, 255, 256, 259, 260, 262, 263, 264, 265, 267, 268, 269, 271, 272, 273,

274, 275, 276, 277, 280, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 310, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 331, 332, 333, 334, 335, 336, 347, 348, 349, 350, 351, 352, 355, 356, 357, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 371, 372, 373, 374, 375, 376, 393, 397, 398, 399, 402, 403, 404, 406, 411, 412, 413, 414, 415, 417, 418, 419, 420, 422, 423, 424, 425, 427, 430, 432, 440, 441, 460, 461, 463, 464, 465, 466, 467, 468, 471, 472, 474, 481, 482, 484, 485, 1721, 1722, 1826, 1827, 1828, 208, 470, 279, 258)

Developing greenfield land is contrary to and undermines existing policy of redeveloping cleared urban brownfield sites rather than greenfield areas. As given the choice developers prefer easier to develop greenfield sites to brownfield, particularly on cost and profit ground.

Mrs Christine Eddy (429), Alexander Wright (435)

Use brownfield sites where flats have been demolished for example in Thrushcraigs, Glenburn, Todholm, Foxbar, Blackford, Seedhill, sites which could utilise existing amenities and transport links. The use of town centre sites rather than greenfield would be less costly.

Peter J Dixon (1816)

The loss of green belt should only be considered once all brownfield sites have been built on. There are many derelict parts of Paisley that urgently need regeneration or redevelopment and although potential developers prefer greenfield sites, they should be driven to use up brownfield sites first.

David Dunlop (1976)

Renfrewshire has over 10 years brownfield land supply and further greenfield release would undermine its regeneration, particularly in relation to Bishopton a contaminated site of Scotland wide significance.

Paisley West & Central Community Council (345), Gillian Jamieson (1426), Gordon Keir (1836), Hugh Meighan (1987), Mr T. Russell (1988), Councillor Mike Holmes (2013), Karen Gilchrist (2042)

The former ROF Bishopton site offers the opportunity for housing in the countryside. This and other brownfield sites negate the need to consider the use of greenfield sites. By forcing the use of brownfield sites in the first instance these prime greenfield sites will still be available in the future once it is clearer which direction the economy is taking.

William Armstrong (1858)

The release of land for potential housing developments is unnecessary as it would lead to a significant over-supply of land for new homes compared to the projected demand into the middle of the next decade. This would discourage many developers from using brownfield land for redevelopment within existing urban areas as they would prefer to fulfil such demands by building on the easier to develop greenfield sites.

Economic Constraints

Peter & Marion Kelt (1871)

There are other locations which could be used which would be more financially viable and would have less detrimental effect on the quality of life of existing residents.

Ross McMath (1856)

Given the sustained and predicted continuation of the financial downturn, it is predicted that the housing market will remain slow with limited movement due to financial constraints. Therefore question the need for any greenfield release, particularly with the redevelopment of ROF Bishopton negating any further need for development and eroding greenbelt. Low cost housing in existing urban areas is what is needed.

Angus Matheson (339)

Release of greenfield sites in a difficult economic, financial and mortgage climate, will stand to prejudice the development of brownfield sites allocated and identified as suitable for housing development.

Martin Dougall (225), Walter Reid (502), Daniel Mungin (1918), Janet Reid (1983)

In the present economic climate, the requirement for 543 greenfield sites is questionable. No one can provide written statistic evidence as how these figures were arrived at and therefore suggest there is no requirement for greenfield release the housing requirements can be met by the many brownfield sites in Renfrewshire.

Gillian Jamieson (1426)

What evidence is there that the current provision of land available for development on brownfield is insufficient to meet the development needs. The Scottish Government's promise to build 35,000 house per year for the next 10 years was based upon a Scottish Housing Market Review in 2007 and challenge whether the evidence from this report is still valid particularly based on the current economic crisis.

Mr T. Russell (1988)

There are a number for houses for sale without adding more.

Contravenes Policy

Dr William Manley (1737)

Developing greenfield land contravenes every one of the council's stated objective, principles and policies for development in the green belt without giving a single explanation for doing so.

Martin Dougall (225), Mr Kenneth Campbell (458)

It is not normally considered appropriate in Scottish Planning Policy (SPP) (CD/03) for green belt land to be released for residential development. SPP requires all non-green

belt sites to be considered first, prior to the proposed development on green belt land.

Precedent

Shillingworth Standard Letter (173, 237, 499, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1041, 1042, 1043, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1748, 1750, 1751, 1752, 1753, 1754, 1755, 1757, 1758, 1759, 1761, 1765, 1767, 1770, 1771, 1772, 1774, 1777, 2118)

The site at Shillingworth has, until recently, been considered unsuitable / not a priority for development. If Renfrewshire Council can change their mind regarding this site then it is hard to be reassured that this will not happen with other potential green belt sites around Bridge of Weir.

Proposal P3

Mactaggart & Mickel (Homes) Ltd (1801)

Support in principle proposals P3, that sites not delivered in the lifetime of the plan will revert back to green belt status. But clarification is required by what is meant by 'delivered' and also 'by the time of the next LDP'.

Andrew Forrest Properties (85)

Support the LDP's proposal to return undeveloped sites back to green belt should they fail to come forward within the lifetime of the plan. The site 'Land south of Kilmalcolm

Road and Strathgryffe Crescent' (Site ref. 2285) is in the sole ownership of the landowner and therefore unlikely to be land banked for development in the longer term.

Elderslie Community Council (2059)

The idea that sites will return to green belt if undeveloped after five years is questionable. Once a site is identified for residential development in an approved LDP, the landowner / developer won't accept the dramatic drop in land value of the site being removed in the next LDP. A Reporter is unlikely to accept a housing site going back to green belt especially when there is an ever-increasing gap between the 35,000 homes a year that Scotland need to build and the much smaller number actually getting built.

Duncan MacIntosh (1891)

The release of greenfield sites will divert investment from house building to land banking. Large house builders and their banks depend on increasing land values for profits and making money rather than building and selling houses. The release of excessive green belt land could reduce rather than encourage house building.

Proposal P3 is unworkable. If a developer bought part of the Paisley South Expansion Area and got planning permission for development in 2024 and did minimum work before 2025 and stopped claiming causes outwith their control, there would be a legal challenge to the re-designation of the site to greenbelt as it would be unreasonable to take such action.

David Wilson Homes (2095)

The suggestion that new greenfield allocations should be temporary, without setting out remediation in the event that they are undelivered is questionable. The identification of the sites in Policy P3 is necessary to make up the 5 year effective housing land supply. Their removal from that supply if undeveloped would therefore increase the housing land shortfall and require the identification of further sites. The ambiguity surrounding a site subject to this approach would be misleading to communities who have a right to a degree of certainty.

Mr W Thomson (1808)

The fact that the council are only proposing the release of the sites within Policy P3 for a temporary period suggests that there has been a less than thorough appraisal of the importance and ability for the sites to be developed.

Mr A.R. Nicol (1854)

Proposal P3 undermines the integrity and sustainability of the green belt designation. There is no precedent for a temporary relaxation of green belt designation to achieve residential development. A developer would only need to dig a few trenches and claim that development has commenced to avoid the accusation of land banking. This is a meaningless caveat designed to camouflage a flagrant breach of green belt policy.

Stewart Milne Homes (1883)

Proposal P3 is considered to go beyond what is reasonable and would benefit from some

rewording.

Park Lane (158)

Some additional flexibility should be built into the wording of Proposal P3.

J&H Ritchie Ltd (2090)

Suggest that the approach taken in Proposal P3 wherein if development does not occur in the lifetime of the plan that the sites should revert back to green belt, should be applied to the full range of development sites. Thereby should any alleged development ready sites not deliver then it does not continue to disadvantage other more appropriate sites.

Effectiveness of additional housing sites

David Wilson Homes (2095)

The additional housing sites identified in Policy P3 may not be the most suitable sites to be released.

Ranfurly Castle Golf Club (16)

Bridge of Weir is served by very few housing allocations and importantly none for the upper sector of the housing market. The sites identified within Policy P3 are not considered as effective nor would they bring wider benefits to the area.

Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112)

Although the LDP states that all additional housing sites have been chosen due to their ability to meet planning and sustainability criteria as well as be delivered within the timeframe of the LDP, there is no test of effectiveness highlighted in the LDP or any background paper. In fact the sites allocated are said to have a number of constraints to overcome delivery in the short term, therefore they cannot be deemed to be effective or capable of becoming effective. These sites should only be allocated as part of the development strategy or included in any effective land supply once their deliverability is proven.

Support for Policy P3

NHS (1876)

Support the council's policy stance as it is both pragmatic and pro-active.

David Wilson Homes (2095)

The principle of promoting additional, greenfield sites for housing development, over and above the effective land supply is welcomed and supported.

Andrew Forrest Properties (85)

Support the Proposed LDP aim of allocating additional sites for housing above the GCVSDPA (CD/02) identified level. However object that the site 'Land south of

Kilmalcolm Road and Strathgryffe Crescent' (Site ref. 2285) has not been included within Policy P3.

General

Russell Campbell (217), Christopher Gresham (229), Julia Doyle (242), Linda Motherwell (313), Christine Clark (1863), Omar Mahmood (1885), Robert Adam (1937), Paula Adam (1939)

Development of green belt will have a devastating effect on the local community, residential amenity, eroding and eradicating the unique nature and social and economic character of villages, land and countryside.

Christopher Gresham (229), Elderslie Community Council (2059)

Concerned about encroachment onto green belt along the sensitive southern edges of Paisley, Elderslie and Johnstone. Further erosion will simply erode the distinctive identities of the three communities.

Russell Campbell (217)

Green belt is part of the fabric of local communities, and its destruction by permanent or temporary buildings can have a substantial impact. If greenbelt is compromised by jobs displaced from other local businesses, then there is an overall net loss to the community.

Carol MacKay (505), Iain MacKay (1986)

I thought the whole reason for having green belt was to protect the countryside from too much expansion.

Mr Richard Fleming (1898), Mrs Lorraine Fleming (1900)

Green belt should be defended against inappropriate development and that all encroachment of built-up areas should be resisted. Expansion beyond the limit of the existing established green belt boundary should not be allowed under any circumstances.

Dr Norman Sharp (283)

The greenfield areas around Johnstone required to be maintained to stop the creep of an enormous conurbation with associated pollution.

Mrs Mary Spalding (386)

Oppose any rezoning of the green belt in Houston due to the lack of infrastructure and impact on the village.

Martin Dougall (225)

Green belt serves numerous functions, including safeguarding open spaces, providing access to the green network, as habitats and wildlife corridors, acting as carbon sinks, for recreation, defining the boundaries of individual communities. It is a sad aspect of modern development trends that they continue to be lost to development and there is a continual

erosion of the quality of the environment for both human population and wildlife.

Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112)

Greenfield sites beyond existing developed edges within the green belt provide very little range and choice of sites throughout Renfrewshire.

It is not necessary for the LDP to present two policies and schedules dealing with brownfield and greenfield.

Mr A.R. Nicol (1854)

In the preparation of the LDP there was no indication of a greenfield release or any relaxation of green belt designation.

There is no evidence of an objective assessment of potential sites. If green belt sites are to be released, good planning practice requires a rigorous and detailed assessment of potential locations. It is clear in this instance the council has simply selected 2 sites submitted by developers. This cannot be accepted as a rational basis for releasing green belt sites.

The Plan provides between 620 and 1120 units above the housing land requirements therefore the site in Houston identified together for 33 units is therefore not required to meet the need or demand for housing. Housing is an optional extra. There is no obligation or overwhelming reasons to release these sites in Houston from the green belt.

The Plan fails the requirements of Circular 1/09 and flies in the face of the Scottish Government's desire to see transparency in the production of development plans. The Plan must be sufficiently clear to enable people to understand what is proposed.

NHS (1876)

Welcome the inclusion of the site at Johnstone Hospital within Policy P3. However query the indicative capacity of 50 units, as the site could accommodate 130 units.

Gail McClory (213), George Paterson (236), Houston Community Council (2036), Save Houston Village Renfrewshire Greenbelt (2039), Lorna Dunlop (2048), Donald P Hepburn (2058)

Concerned that development of the sites listed in Policy P3 will impact on local schools, roads, traffic, drainage, existing water and sewerage, schools and other infrastructure.

Modifications sought by those submitting representations:

Don't develop on green belt. (107, 199, 213, 217, 225, 236, 239, 242, 243, 270, 282, 283, 313, 343, 345, 386, 429, 435, 489, 505, 511, 1426, 1811, 1816, 1823, 1825, 1831, 1833, 1835, 1852, 1854, 1855, 1856, 1858, 1881, 1884, 1885, 1887, 1891, 1892, 1893, 1894, 1898, 1900, 1921, 1937, 1983, 1986, 1987, 1988, 1990, 1998, 2009, 2010, 2013, 2036, 2039, 2042, 2058, 2059)

Remove Shillingworth from Policy / Proposal P3. (107, 489, 505, 1836, 1856, 1863, 1867, 1898, 1900, 1918, 1921, 1937, 1983, 1986, 1990, 2008, 2009, 2013)

Shillingworth Standard Letter (173, 237, 499, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1041, 1042, 1043, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1748, 1750, 1751, 1752, 1753, 1754, 1755, 1757, 1758, 1759, 1761, 1765, 1767, 1770, 1771, 1772, 1774, 1777, 2118)

Remove Abbey Road, Elderslie from Policy / Proposal P3. (199, 225, 239, 242, 266, 270, 282, 313, 1885, 2059)

Abbey Road Standard Letter (229, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1100, 1102, 1103, 1104, 1105, 1107, 1108, 1109, 1110, 1111, 1112, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1720, 197, 199, 222, 228, 230, 231, 233, 234, 238, 244, 245, 246, 247, 248, 249, 250, 251, 253, 254, 255, 256, 259, 260, 262, 263, 264, 265, 267, 268, 269, 271, 272, 273, 274, 275, 276, 277, 280, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 310, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 331, 332, 333, 334, 335, 336, 347, 348, 349, 350, 351, 352, 355, 356, 357, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 371, 372, 373, 374, 375, 376,

393, 397, 398, 399, 402, 403, 404, 406, 411, 412, 413, 414, 415, 417, 418, 419, 420, 422, 423, 424, 425, 427, 430, 432, 440, 441, 460, 461, 463, 464, 465, 466, 467, 468, 471, 472, 474, 481, 482, 484, 485, 1721, 1722, 1826, 1827, 1828, 208, 470, 279, 258)

Remove East of Fleming Road, Houston from Policy / Proposal P3. (285, 339, 437, 1426, 1854, 1976, 2036, 2039, 2046, 2048, 2049, 2092)

Remove Houston Road, Houston from Policy / Proposal P3. (285, 339, 437, 1426, 1737, 1808, 1854, 1976, 2036, 2039, 2046, 2048, 2049, 2092)

Houston Road Standard Letter (437, 493, 498, 514, 642, 656, 854, 954, 1026, 1028, 1042, 1047, 1209, 1212, 1213, 1214, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1246, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1308, 1309, 1310, 1311, 1312, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1349, 1350, 1351, 1353, 1354, 1355, 1356, 1357, 1358, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1381, 1382, 1383, 1386, 1387, 1390, 1392, 1393, 1397, 1398, 1399, 1400, 1402, 1403, 1406, 1408, 1410, 1412, 1414, 1415, 1420, 1421, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1431, 1434, 1437, 1441, 1442, 1443, 1444, 1445, 1446, 1448, 1449, 1450, 1451, 1452, 1453, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1480, 1481, 1482, 1483, 1484, 1485, 1487, 1488, 1489, 1490, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 1519, 1520, 1521, 1522, 1523, 1524, 1525, 1526, 1528, 1529, 1530, 1531, 1532, 1533, 1534, 1535, 1536, 1537, 1538, 1540, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1549, 1551, 1552, 1553, 1554, 1556, 1557, 1558, 1559, 1560, 1562, 1563, 1564, 1565, 1568, 1570, 1572, 1575, 1579, 1580, 1581, 1583, 1584, 1585, 1587, 1588, 1589, 1590, 1591, 1593, 1597, 1598, 1599, 1600, 1601, 1602, 1604, 1605, 1606, 1607, 1608, 1609, 1611, 1612, 1613, 1614, 1615, 1616, 1618, 1619, 1620, 1621, 1622, 1623, 1624, 1625, 1626, 1627, 1628, 1629, 1630, 1631, 1632, 1633, 1634, 1635, 1636, 1637, 1638, 1639, 1640, 1641, 1644, 1645, 1646, 1647, 1648, 1649, 1651, 1652, 1669, 1670, 1671, 1672, 1673, 1674, 1676, 1677, 1678, 1679, 1680, 1681, 1682, 1683, 1684, 1687, 1688, 1689, 1690, 1691, 1692, 1693, 1694, 1695, 1696, 1697, 1698, 1699, 1700, 1701, 1702, 1703, 1707, 1708, 1709, 1710, 1711, 1712, 1713, 1714, 1715, 1716, 1717, 1718, 1719, 1723, 1725, 1726, 1727, 1728, 1729, 1730, 1731, 1732, 1733, 1734, 1735, 1736, 1737, 1738, 1739, 1740, 1741, 1742, 1756, 1763, 1764, 1769, 1782, 1787, 1788, 2106)

Remove Merchiston Hospital site from Policy / Proposal P3. (283, 503, 1731, 1871)

Schedule 1 should be amended to Johnstone Hospital having an indicative capacity of 130 units. (1876)

The area of land at Arkleston should be included in Proposal P3. (2090)

The site at Clevens Road, owned by the golf club should be included in Proposal P3 for

an indicative capacity of 5 units. (16)

Include 'Land to the south of Kilmalcolm Road and Strathgryffe Crescent, Bridge of Weir' as being suitable for housing development to meet the housing land requirements within the plan period. (85)

Proposal P3 – Additional Housing sites, greenfield should be deleted from the Proposed LDP. The word 'landbanking' should also be deleted from the LDP.

Land east of Fleming Road and Houston Road, Houston should remain within the green belt and should be removed as a housing allocation from Schedule 2. (2095)

The second sentence of Proposal P3 should be deleted and replaced with the following wording: 'Should development not occur within the lifetime of the Plan the continued allocation of the sites for residential development may be reviewed.' (185, 1883)

Consolidate policy and schedule for additional housing sites and it should read as follows:

Policy P3 – Additional Housing Sites

The Council has allocated residential development on the sites identified in Schedule 1. These are identified on the proposals maps as additional allocated housing sites to meet the identified housing land requirements and maintain a 5 year effective land supply at all times. These sites are required to comply with the criteria set out in the New Development SG (CD/09) to ensure that they make a positive contribution to Renfrewshire's places. (2112 and 2114)

Summary of responses (including reasons) by planning authority:

Consented / Brownfield sites (107, 199, 217, 225, 236, 239, 243, 266, 270, 282, 283, 285, 339, 343, 345, 429, 435, 437, 489, 503, 511, 1426, 1731, 1805, 1811, 1816, 1823, 1825, 1831, 1833, 1835, 1836, 1852, 1854, 1855, 1856, 1863, 1867, 1881, 1884, 1891, 1892, 1893, 1894, 1898, 1900, 1921, 1937, 1939, 1976, 1987, 1988, 1990, 1998, 2009, 2010, 2013, 2036, 2039, 2042, 2046, 2049, 2059, 2092, 2112)

Houston Road, Standard Letter (437, 493, 498, 514, 642, 656, 854, 954, 1026, 1028, 1042, 1047, 1209, 1212, 1213, 1214, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1246, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1308, 1309, 1310, 1311, 1312, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1349, 1350, 1351, 1353, 1354, 1355, 1356, 1357, 1358, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1381, 1382, 1383, 1386, 1387, 1390, 1392, 1393, 1397, 1398, 1399, 1400, 1402, 1403, 1406, 1408, 1410, 1412, 1414, 1415, 1420, 1421, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1431, 1434, 1437, 1441, 1442, 1443, 1444, 1445, 1446, 1448, 1449, 1450, 1451, 1452, 1453, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1480, 1481, 1482, 1483, 1484, 1485, 1487, 1488, 1489, 1490,

1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 1519, 1520, 1521, 1522, 1523, 1524, 1525, 1526, 1528, 1529, 1530, 1531, 1532, 1533, 1534, 1535, 1536, 1537, 1538, 1540, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1549, 1551, 1552, 1553, 1554, 1556, 1557, 1558, 1559, 1560, 1562, 1563, 1564, 1565, 1568, 1570, 1572, 1575, 1579, 1580, 1581, 1583, 1584, 1585, 1587, 1588, 1589, 1590, 1591, 1593, 1597, 1598, 1599, 1600, 1601, 1602, 1604, 1605, 1606, 1607, 1608, 1609, 1611, 1612, 1613, 1614, 1615, 1616, 1618, 1619, 1620, 1621, 1622, 1623, 1624, 1625, 1626, 1627, 1628, 1629, 1630, 1631, 1632, 1633, 1634, 1635, 1636, 1637, 1638, 1639, 1640, 1641, 1644, 1645, 1646, 1647, 1648, 1649, 1651, 1652, 1669, 1670, 1671, 1672, 1673, 1674, 1676, 1677, 1678, 1679, 1680, 1681, 1682, 1683, 1684, 1687, 1688, 1689, 1690, 1691, 1692, 1693, 1694, 1695, 1696, 1697, 1698, 1699, 1700, 1701, 1702, 1703, 1707, 1708, 1709, 1710, 1711, 1712, 1713, 1714, 1715, 1716, 1717, 1718, 1719, 1723, 1725, 1726, 1727, 1728, 1729, 1730, 1731, 1732, 1733, 1734, 1735, 1736, 1737, 1738, 1739, 1740, 1741, 1742, 1756, 1763, 1764, 1769, 1782, 1787, 1788, 2106)

Abbey Road Standard Letter (229, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1100, 1102, 1103, 1104, 1105, 1107, 1108, 1109, 1110, 1111, 1112, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1720, 197, 199, 222, 228, 230, 231, 233, 234, 238, 244, 245, 246, 247, 248, 249, 250, 251, 253, 254, 255, 256, 259, 260, 262, 263, 264, 265, 267, 268, 269, 271, 272, 273, 274, 275, 276, 277, 280, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 310, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 331, 332, 333, 334, 335, 336, 347, 348, 349, 350, 351, 352, 355, 356, 357, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 371, 372, 373, 374, 375, 376, 393, 397, 398, 399, 402, 403, 404, 406, 411, 412, 413, 414, 415, 417, 418, 419, 420, 422, 423, 424, 425, 427, 430, 432, 440, 441, 460, 461, 463, 464, 465, 466, 467, 468, 471, 472, 474, 481, 482, 484, 485, 1721, 1722, 1826, 1827, 1828, 208, 470, 279, 258)

It is agreed that there are a number of existing development / housing sites which have planning consent, consisting of brownfield land which are spread across the Renfrewshire area. All of these sites have been included in the total housing land supply, but all of these sites combined do not meet the requirements of the housing need and demand for the area, and do not provide a generous housing land supply.

In relation to other existing brownfield sites within Renfrewshire, most of these are within existing industrial or business areas or on land considered not suitable or compatible for housing development. All land within the entire Renfrewshire area has been assessed through a land use considerations planning sustainability assessment (CD/06), strategic environmental assessment (CD/07), a landscape assessment (CD/08) along with undertaking the Suggestion for Land Use Change exercise, consultation at the pre Main Issues Report stage and the Main Issues Report stage, and any sites considered suitable for residential development has been put forward in the proposed LDP. In assessing all potential development land, the council identified the sites considered to have the least

impact on the environment as well as other factors such as affect on biodiversity, services, facilities, infrastructure, etc. These assessments were used along with discussions with key agencies, service providers, other council services as well as landowners / developers to identify the most suitable sites to deliver the required housing land, and directing growth to the most appropriate locations. Policy P3 identifies those sites that emerged as appropriate given that they related well to the existing settlements and could be accommodated in terms of transport, services and landscape. The more detailed assessment of the sites included within Policy P3 are contained in Issues 19, 20, 21, 22, 23, and 24 as well as in the background papers that accompanied the Main Issues Report (Site Assessment – Land Use Considerations (CD/06), Site Assessments – Strategic Environmental Assessment (CD/07)) and the proposed LDP (Housing Land Requirements (CD/41)).

The council appreciate the concern expressed by many that by identifying sites in the green belt as part of the overall housing land supply identified in the proposed LDP that many of the existing brownfield sites may not be developed. However to accord with Scottish Planning Policy (CD/03), the LDP needs to maintain a 5-year supply of effective housing land at all times. The effective land supply that has been identified in the Renfrewshire 2012 Housing Land Audit (CD/38) is not sufficient to meet the housing land requirements and therefore some short term effective housing sites required to be identified. The Scottish Government take the view that house building is an important contributor to the economy, and that the planning system can help address the challenges facing the housing sector by adopting a positive and flexible approach to development. This is the approach taken in the proposed LDP.

With reference to the Glasgow and the Clyde Valley Strategic Development Plan (GCVSDP) (CD/02), the identification of green belt release sites to provide development in the short term accords with Strategic Support Measure 10 in that flexibility has been built into the housing land supply to support development sites to come forward. The GCVSDP (CD/02) recognises that given the degree of uncertainty in the current housing market and the availability of public subsidy that local authorities may require additional flexibility to plan for housing, particularly over the short term to 2020. There was a shortfall in Renfrewshire's effective land supply and this is why green belt land was brought forward.

As identified above and in the Schedule 4 submission for Issue 17, there is a need to release sites for housing development in the green belt. Both national and strategic policy promotes a positive and a flexible approach to development to deliver new homes. Scottish Planning Policy (paragraph 66) (CD/03) states that the Scottish Government is committed to increasing the supply of new homes. Paragraph 70 of Scottish Planning Policy (CD/03) then highlights that when determining the scale and distribution of the housing requirement that planning authorities direct development to particular locations to achieve desired policy outcomes and that in such circumstances the planned level or direction of growth may not reflect past trends. Therefore although green belt release has not been required in Renfrewshire since early 1990's, there is both a need and requirement for the approach adopted in the proposed LDP.

It is agreed that the green belt serves an important function and that is why it is tightly fitted around all settlements in Renfrewshire, directing growth to the right locations, either within or adjacent to existing settlements and protecting the character, landscape setting and identity of settlements. Each of the sites identified in Policy P3 is considered to promote a sustainable pattern of growth which is appropriate to each area, with the

opportunity to integrate well with the existing and proposed built development form and with green infrastructure. When undertaking the Strategic Green Belt Review (CD/49) in preparation of the proposed LDP all potential green belt boundary changes were assessed against the principles of sustainability. Changes to the green belt boundary were seen to provide the flexibility that is required from the Scottish Government. All green belt sites released for development through the proposed LDP not only provide a range, choice and generosity of development sites to meet the housing land requirements but also have the potential to improve linkages with the green network, enhance green infrastructure and connectivity within and outwith settlements.

The proposed LDP Spatial Strategy promotes regeneration and reuse previously developed land before development on greenfield. The Council are taking a proactive approach to encourage and support development on brownfield sites in order to successfully deliver the LDP Spatial Strategy. There are a number of actions identified in the LDP Action Programme (CD/01) which will build upon the council's efforts to redevelop derelict buildings, buildings that are on the Buildings at Risk register, vacant and abandoned sites.

All of the sites which have gone through building demolition programmes and are subject to regeneration programmes are included within the proposed LDP. The Council recognises that a different approach is required to develop these areas and most of the sites within existing urban residential areas are identified as Policy P4 Housing Action Programme sites where the Council will work with a range of partners and identify different delivery mechanisms and approaches to promote and support development in these areas.

The proposed LDP Spatial Strategy as well as Policy P5 identifies the delivery of development within the Community Growth Areas (CGAs) of Bishopton and Johnstone South West as important. The selection of sites considered appropriate for greenfield release was done so by taking into consideration the potential impact on the CGAs, aiming to ensure there was no significant greenfield release in close proximity of the CGAs.

It is agreed that given the choice developers would prefer to develop on greenfield sites rather than brownfield. However over the last 8 years the total of new build housing completions within Renfrewshire has seen brownfield completions account for on average 80% of all completions. Therefore Renfrewshire Council have been very successful with supporting brownfield development. The proposed LDP Spatial Strategy demonstrates the council's commitment to seek to continue this trend through various methods, mechanisms and approach as detailed in Issue 17 and the addendum to the housing background paper (CD/40). Nonetheless while the council's focus remains on brownfield sites, it will encourage development on all suitable residential sites

Economic Constraints (225, 339, 502, 1426, 1856, 1871, 1918, 1983, 1988)

The financial viability of the sites identified within Policy P3 was considered by the developers with confirmation provided to the planning authority in each case by the landowner/developer that the site for housing development is an effective site which can be delivered within the five year period. Further details regarding the effectiveness test for the green belt release sites is set out in the addendum to the housing paper.

It is agreed that economic factors will affect the delivery of housing and it is likely that a

slower rate of house completions may continue for a period of time. However Scottish Planning Policy (CD/03) states that planning can help address the challenges facing the housing sector. The GCVSDP (CD/02), through Strategy Support Measure 10, indicates that in light of the prevailing housing market conditions that local authorities may need to identify additional housing sites for release in order to maintain a five year effective housing land supply. Therefore in line with national and strategic objectives, the proposed LDP provides a range of sites that are available to allow the market to respond effectively.

It was anticipated in the early redevelopment of the Community Growth Area (CGA) at Bishopton that around 200 – 300 residential units would be built each year at the site. Currently around 70 – 80 units are likely to be completed each year on the site. Therefore this factor has also to be taken into consideration as large development sites are not producing the numbers anticipated.

Over the past 2 – 3 years the council, housing associations and private developers have been successful in delivering low cost housing options primarily within urban areas. We aim to work with partners to try and maintain this trend but can see challenges. However low cost housing is not just required within urban areas, there requires to be a choice of sites across Renfrewshire. In order to lower the risk on sites, private developers are currently considering low cost housing mechanisms and this could be an option for some of the sites identified in Policy P3 where developers could provide low cost private housing or private shared equity schemes.

Contravenes Policy (225, 458, 1737)

The need for green belt release is clearly outlined in the proposed LDP and is addressed in the Schedule 4 submissions for Issues 1, 17, 19, 20, 21, 22, 23, 24 and 39. The existing land supply identified in the Housing Land Audit 2012 (CD/38) is insufficient to meet the housing need and demand and does not provide a generous supply of housing land. The wider economic, social and environmental factors have been taken into account when providing land to meet the housing land requirements. In doing so the sites identified within Policy P3 are considered to comply with the objectives, principles and policies at the national, strategic and local level in that they promote sustainable economic growth, sustainable development and positive placemaking as well as trying to maintain the delivery of a low carbon economy. The sites identified will support investment, enhance communities and places and provide high quality new development in the right locations as identified by the planning, environmental and landscape assessments that were undertaken. Therefore we disagree that green belt release contravenes policy.

Precedent (Shillingworth Standard Letter)

The reason for identifying the site at Shillingworth, Bridge of Weir as well as the other sites included within Policy P3 is well documented in this Issue as well as Issue 17 and 22. To meet the need of future housing requirements, the housing land supply within Renfrewshire requires to be continuously reviewed and where these requirements are not met by the existing housing supply, additional sites will require to be identified through assessment at the appropriate time.

Proposal P3 (85, 1801, 1854, 1891, 2059, 2095)

The council would like to see investment in the short, medium and long term and it is

recognised that house building makes a positive contribution to the local economy. It is understood that the planning authority requires to be flexible to encourage development in the right locations. The reason for Proposal P3 is to aim to encourage planning applications to come forward at an early stage after the adoption of the plan to try and ensure development will be secured within the plan period. Therefore at the time of preparing the next local development plan and the housing land supply is reviewed the council would like to be assured that there is a degree of certainty that development is going to take place on these sites. If there is no positive action from developers on the sites identified in Policy P3 within the 2 to 3 years from the adoption of the plan, then other effective sites will required to be sourced in the preparation of LDP2 to ensure that there is a continuous 5 –year effective land supply within the LDP. Proposal P3 is a mechanism to encourage developers to deliver on sites that they said were effective in terms of Planning Advice Note (PAN) 2/2010 (CD/42).

Effectiveness of additional housing sites (16, 2095, 2112)

The sites chosen for green belt release as identified through the land use considerations planning sustainability assessment (CD/06), strategic environmental assessment (CD/07), landscape assessment (CD/08) as well as the strategic review of Renfrewshire's green belt (CD/49) help deliver sustainable communities that are in places which offer a high quality of life with a wide range of existing assets and we consider them to suitable, and effective.

Support for Policy P3 (85, 1876, 2095)

Support for Policy P3 is noted and welcomed. The council's reasons for not allocating the site at 'Land south of Kilmalcolm Road and Strathgryffe Crescent, Bridge of Weir' within Policy P3 is covered in the Schedule 4 submission for Issue 26.

General

Russell Campbell (217), Christopher Gresham (229), Julia Doyle (242), Linda Motherwell (313), Christine Clark (1863), Omar Mahmood (1885), Robert Adam (1937), Paula Adam (1939)

It is considered that the number of sites proposed to be developed in the green belt is not significant and that across Renfrewshire the sites have been chosen to ensure that they will have minimal impact on the local community, amenity, landscape etc, as set out in the criteria used for the planning and environmental site assessment background papers that accompanied the Main Issues Report and the proposed LDP and this further explained in the additional housing addendum paper (CD/40). Over 74% of the land within Renfrewshire is designated as green belt. By developing all of the sites indicated in Policy P3 this would remove only 0.2% of the overall green belt total. The designated green belt has actually increased in the proposed LDP from the adopted Renfrewshire Local Plan (2006). In the 2006 Renfrewshire Local Plan, 19,776 hectares of land are designated as green belt, and in the Renfrewshire proposed LDP 20,003 hectares of land are designated as green belt. This includes the deduction of all of the land associated with Paisley South Expansion Area and the nine green belt sites included in the list of sites within Policy P3. The reason for this is that the council has put land back into the green belt at Bishopton and Erskine which was previously allocated for development. For the reasons above we would disagree that the green belt is a scarce resource.

Christopher Gresham (229), Elderslie Community Council (2059)

Although the sites listed in Policy P3 are released from the green belt on the edges of settlements, it is considered that these are logical extensions which not only integrate well with the existing built up area but can also be sensitively developed to protect the character, landscape setting and identity of settlements. The distinctiveness of each community will not be significantly affected by the additional housing developments.

Carol MacKay (505), Mr Richard Fleming (1898), Mrs Lorraine Fleming (1900), Iain MacKay (1986)

Scottish Planning Policy (paragraph 159) (CD/03) states 'Green belt designation should be used to direct development to suitable locations, not to prevent development from happening.' There was a need to review the green belt boundaries as a result of the need to plan for growth in the most appropriate locations across Renfrewshire. The Council undertook a strategic green belt review (CD/49) as part of the preparation of the proposed LDP. The review was undertaken on a settlement by settlement basis, looking at current and historical development pressures, examining existing infrastructure capacity opportunities and constraints, looking at accessibility to sustainable modes of travel, potential linkages to green networks and classifying all green belt land within a 500 metre radius of the settlement boundary, indicating from this analysis, potential development sites which could be released for development. The sites identified within Policy P3 were considered the most appropriate locations for this planned growth.

Dr Norman Sharp (283)

Green belt designation is often used to prevent coalescence of settlements in an area. Paragraph 160 of SPP (CD/03) does indicate that there may be circumstances where coalescence does create a more sustainable settlement pattern. Coalescence was a factor that was taken into account in the land use considerations planning sustainability assessments (CD/06) and the landscape assessments (CD/08) and it was considered that none of the development sites outlined in Policy P3 will result in coalescence and that the green belt that will remain the dominant land use surrounding each settlement. Issues 19, 20, 21, 22, 23 and 24 address the concerns raised regarding coalescence with regards to each particular site.

Mrs Mary Spalding (386)

The requirement for green belt land is explained fully above and the lack of infrastructure and the impact on Houston is covered in Issues 23 and 24.

Martin Dougall (225)

It is agreed that the green belt serves numerous functions. Development on limited parts of the green belt will not have a significant impact on existing functions. Each of the development sites listed in Policy P3 will require to contribute to the overall place by creating attractive and well-connected networks and corridors through the site and linking them to existing areas. It should be noted that the Council have not released green belt land for development since the Renfrew District Plan in 1996, therefore would not agree that green belt development has been a continuous trend within Renfrewshire. The plan aims to ensure an appropriate balance between development and investment in the area and protection of the environment to maintain a quality environment and place.

Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112)

The Council considers that it was necessary to have 2 schedules to distinguish between sites which are brownfield sites in the green belt, and greenfield sites within the green belt to show that the plan prioritises all previously developed land before development on virgin land in the green belt.

Mr A.R. Nicol (1854)

The housing land supply section of the Main Issues Report (MIR) (CD/05) did state that given the need to achieve the housing need and demand targets, additional land release for housing will require to be identified by the LDP. At this stage there was no finalised housing supply targets identified and it was considered that the housing need and demand could be largely met by existing brownfield land. We consider that the plan is sufficiently clear to provide an understanding of what is proposed.

NHS (1876)

The sites identified within Policy P3 have an indicative capacity assigned to each based on 25 units per hectare which is the level which was agreed by Homes for Scotland, as well as an assessment of landform and landscaping. The proposed LDP aims to identify areas within Renfrewshire capable of a residential land use. The detail for each site would be considered as part of a planning application that was submitted for consideration. No change to the plan is required.

Gail McClory (213), George Paterson (236), Houston Community Council (2036), Save Houston Village Renfrewshire Greenbelt (2039), Lorna Dunlop (2048), Donald P Hepburn (2058)

The sites identified in Policy P3 have been assessed to ensure that there will be no significant impact. Various issues in relation to the sites, identified by many of the respondents, have been fully detailed in Issues 19, 20, 21, 22, 23, 24 and 39.

Reporter's conclusions:

The location of additional housing sites

1. Policy P3 seeks to support and encourage residential development on sites allocated in the proposed plan as additional to the established housing land supply. Two schedules are included. The first lists redevelopment sites, the second new greenfield sites. This supports the focus on brownfield first. I have found under issue 17 that release of some green belt land will be required to contribute to the need and demand for new housing and to provide an increased range, choice and generosity of sites.
2. I have also found under issue 17 that further sites will need to be found. I note the strength of feeling in relation to the green belt sites. Particular concerns are addressed under site specific issues. I note also the loss of effectiveness of some of the brownfield sites and the council's efforts to bring these forward to conform with the overall spatial strategy for the proposed plan. Nevertheless, there continues to be a need for new greenfield sites. The council must also find further sites through supplementary guidance so that an effective and generous land supply can support the scale of new housing

needed.

3. Under issue 42 I have found that policy ENV1 should continue to protect the green belt from inappropriate development. That will help to direct development to more suitable locations. The search for additional land is likely to start with previously developed land and making currently ineffective sites ready for new housing. That would support regeneration and protect the natural assets of the countryside around existing towns and villages. Nevertheless, with the strategic requirement for additional housing land, the further use of greenfield sites and alteration of the green belt boundaries cannot be ruled out. I have dealt with the supply of land for housing under issue 17. For now, the additional housing sites and Policy P3 do not need to be changed.

4. Site specific representations are dealt with under issues 19-36 and 39 and any changes to the schedules are recommended there.

Return of sites to the green belt

5. Policy P3 in the proposed plan is followed by Proposal 3, seeking the return of additional greenfield sites to the green belt should development not occur within the lifetime of the proposed plan. This relates to the text on page 26, which explains that the council is not in favour of additional greenfield sites being land banked by house builders or developers. Therefore, it adds, if the sites are not delivered by the time of the next LDP, they will return back to green belt.

6. The purpose of this proposal is readily understood. Green belt land should not be surrendered lightly. Sites have been included in the proposed plan to help with the pressing need for a range and choice of sites as a part of an effective 5-year supply. It is therefore right to encourage planning applications to come forward as early as possible. However, representations raise some fundamental concerns about this proposal.

7. I agree that the proposal lacks clarity. It is not clear what is meant by development occurring. Should the whole of the site be developed or should development simply have begun? In any event, once a site is commenced it would be unlikely that completion could be prevented however long that might take, or that there would be any rationale for returning part of a site to the green belt. It is also unclear whether this proposal has a different status to a policy.

8. Timing is also in doubt. Reference to the time of the next LDP might relate to adoption, but the process of identifying further sites will be underway long before then and it is unlikely that there will be sufficient new sites identified to allow the luxury of removing allocated sites from the land supply for housing. More importantly, the process of bringing these sites forward for development and obtaining planning permission will take some time. Any permission would normally be limited to 3 years unless a different time period can be justified. These additional sites are in marketable locations and are all assessed as effective. They are likely to be underway by the time of the next LDP. A fresh assessment of the green belt boundaries is a likely component of the review of the LDP where a shortfall of housing land has been identified. Allocated sites could be excluded at that time if no longer needed in the land supply, provided that there is no extant permission. The concern here should not be about land banking, but whether sufficient land is available for house building in accordance with the plan's spatial strategy and its focus on previously used land.

9. I therefore consider that Proposal 3 should be removed from the proposed plan. The related paragraph in the text of the plan is at page 26. This should be retained to signal the council's intention to return undeveloped sites to the green belt where possible, but the wording should be modified to remove the uncertainties I have set out above.

Reporter's recommendations:

1. Delete Proposal 3 – Additional Housing Sites – Greenfield from the proposed plan.
2. Under Additional Housing sites on page 26 of the proposed plan, replace the text of the fourth paragraph with:

"At present there is great financial uncertainty and house building is seen as a method to kick-start the economy. The council is not in favour of the additional greenfield sites that have been identified in this LDP being left undeveloped. Therefore, any of the additional sites with no planning permission for housing by the adoption of the next LDP may be replaced by other effective sites and returned to the green belt."

Appendix 1: Body or person(s) submitting a representation raising the issue (including reference number):

Shillingworth Standard Letter:	Mr Archibald Butter [833]
Mrs. Teresa Mcquarrie [173]	Mrs E McNicol [834]
Mrs Debbie Kennedy [237]	Sandy McKenzie [835]
Anne Maria Brown [499]	Norman Holmes [836]
Elizabeth Campbell [588]	Ms Agnes McKechnan [837]
Rosemary Ogilvie [589]	Linda Wilbraham [838]
Norma Hancock [590]	Monika Siwy [839]
Dr D Robb [591]	Gerard O'Kane [840]
Marjory Noble [592]	Ms Iris Mackie [841]
Fiona Ramsay [593]	Moirra Galletly [842]
Margaret Stewart [594]	Valerie Mackinnon [843]
Campbell Mackellar [595]	Anna MacDougall [844]
E Stevenson [596]	Maureen Taggart [845]
Jenny Jackson [597]	Annis Hutcheson [846]
Laura Ferguson [598]	G. MacDougall [847]
Julianna Mackellar [599]	J. Bell [848]
G D McClure [600]	Marcella Wylie [849]
Katarzyna Holownia [601]	M McKay [850]
Stuart Mitchell [602]	A. Spiers [851]
M Lawson [603]	M Geacha [852]
Kirsty McKenzie [604]	Chris Gane [853]
Mrs R Hawslay [605]	Kate Pinkerton [854]
Gregor Loose [606]	Alastair Gibson [855]
Mrs Maureen Pepper [607]	Kenneth Waddham [856]
Jocelyn Young [608]	Monica Airs [857]
Mrs M Reid [609]	B Woodcock [858]
Mr J Fawkes [610]	Susan Stump [859]
R Stump [611]	S Macpherson [860]
Rachel Butter [612]	Kenneth Barr [861]
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Ms Sharon Larkin (1311)	Christine Lawson (1600)
Ms Fiona Christie (1312)	Ms Lorna Kinloch (1601)
Mrs P. McCallum (1314)	Ms Kerry Roberts (1602)
Ms Ann Frew (1315)	Ms Linda Basler (1604)
F. Cameron (1316)	Isobel Gallagher (1605)
Gordon Kyle (1317)	Gordon Galloway (1606)
Ms Karen Heyes (1318)	Mr MacGeadie (1607)
Mr Alan Stevenson (1319)	Mrs MacGeadie (1608)
Ms Carly Heyes (1320)	Nigel Jameson (1609)
Barry Sillers (1321)	Alexandra Spearing (1611)
Ms Deborah Summerhill (1322)	Ms Helen Smith (1612)
Ms Susan Orr (1323)	Shelagh Russell (1613)
Martin Abel (1324)	Karen Wilson (1614)
Ms Karen Telfer (1325)	Ms Marianne Boland (1615)
Mr Kenneth Mackinnon (1326)	Lorna Torrens (1616)
Margaret McCabe (1327)	John McEwan (1618)
Ms Beth Morris (1328)	Kim Rotherforth (1619)
Derek Loughlin (1329)	Mrs. Susan Milliken (1620)
Mr Ham (1330)	Samantha Stark (1621)
Mr Alan Linton (1331)	Forrest Cunningham (1622)
Ann Grieve (1332)	Margaret Clarkson (1623)
Marie Richardson (1333)	Sharon Barlow (1624)
Mr Craig Pollock (1334)	Ms Louisa Corlett (1625)
Rachael Hassan (1335)	Katherine Johnson (1626)
Ms Irene Sandham (1336)	Mr. and Mrs. N. Clark (1627)
S Ballantyne (1337)	Phyllis Clark (1628)
Margaret Beattie (1338)	Mr. and Mrs. Black (1629)
Ms Sabine Burkart (1339)	Jenny Dickson (1630)
D. Hart (1341)	E Kinney (1631)
Ms Fiona Gaffney (1342)	Angela Paterson (1632)
Leanne Kelly (1343)	Pamela Redpath (1633)
Ms Paula Galloway (1344)	Laura Cook (1634)
Norma Manwell (1345)	Mrs M. Thomson (1635)
Ms Tracy Ferguson (1346)	David Furniss (1636)
Ms Shirley Gibb (1347)	David Gillanders (1637)
Ray Williamson (1349)	Elaine Mills (1638)
Ms Linda Smith (1350)	F Shaw (1639)
Ms Gail Shaw (1351)	Jane Corr (1640)
Alison Page (1353)	Carol Ann Ronald (1641)
Ms Catrina Houston (1354)	Graham Peters (1644)
Ann Nicolson (1355)	Aisha Davidson (1645)
Julie McCallum (1356)	Victoria Clark (1646)
Greg Lilley (1357)	Elita Storey (1647)
Mr Steve Bunden (1358)	Maura Lynch (1648)
Ms Gillian Hill (1360)	Elaine Rawson (1649)
William Milligan (1361)	Fiona Murray (1651)

Ms Allyson Campbell (1362)	Liz Quinn (1652)
Ms Sharon Glasgow (1363)	Susanne Gray (1669)
Mr Jason Barrett (1364)	Ross Donaghy (1670)
W. Rowan (1365)	Elizabeth McGhee (1671)
Mr Gordon Bradford (1366)	David Donaldson (1672)
Lyndsey McNab (1367)	Julie Reid (1673)
Ms Jennifer Baker (1368)	Peter Richardson (1674)
Sarah McKie (1369)	Joanne Furniss (1676)
Ms Adeline Burns (1370)	Clair Barclay (1677)
Mrs Alison Ritchie (1372)	Sheila Buchanan (1678)
June Borland (1373)	Charlotte Taylor (1679)
Ms Isobel Stewart (1374)	M Gilmour (1680)
Ms Tracy Graham (1375)	John McFarlane (1681)
Ms Katrina Little (1376)	Linda Anderson (1682)
Ms Julie Whaley (1377)	Margaret Chambers (1683)
Angela McMaster (1378)	Ann Marie Gilroy (1684)
Barbara Snodgrass (1379)	J McNeil (1687)
Brian McNab (1381)	Neil Sullivan (1688)
Kathleen Jones (1382)	Grant Cadden (1689)
Karen Carmichael (1383)	A Anderson (1690)
Mike Rotherforth (1386)	Ann Forsyth (1691)
Karen Craig (1387)	A Cameron (1692)
A.W. Scott (1390)	Bernice Scott (1693)
Leigh Munro (1392)	Elizabeth Lawrie (1694)
Derek Whittle (1393)	Paul Rutherford (1695)
Ms Kathleen Campbell (1397)	Ms Fiona Martin (1696)
Ms Anna Ross (1398)	C. Keddie (1697)
Janet Mason (1399)	J. Bright (1698)
Miss A M Cairns (1400)	Ms Lynda McLeod (1699)
Ms Laura Forbes (1402)	Suzanne Bennion (1700)
Dr Kirsty Horne (1403)	Ms Julie Devine (1701)
Ms Kathy McFall (1406)	Mr David Jagger (1702)
Mr Clive Henderson (1408)	Ms Arlene McKay (1703)
C Morrison (1410)	Ms Maria Oto (1707)
Mr James Jamieson (1412)	Ms Jean Allan (1708)
Gwen McKerrell (1414)	Ms Elizabeth Donaldson (1709)
Mr Ray Evans-Nixon (1415)	Ms Moira Dunlop (1710)
Mr Ian Griffiths (1420)	Mr Jack McKechnie (1711)
Mr Roger S. Calvert (1421)	Lindsay McLarren (1712)
Mr J.S Mclay (1423)	Euan Allison (1713)
J Taylor (1424)	N. Sneddon (1714)
Ms Gail Carvil (1425)	Eileen Parsons (1715)
Ms Gillian Jamieson (1426)	Deane Hull (1716)
Ms Isobel McNeil (1427)	Anne Evans (1717)
Garry Turkington (1428)	Ms Lisa Cliff (1718)
Stuart Morrison (1429)	Ms Libby Duncan (1719)
Sandra Brown (1431)	Mr Philip Teese (1723)
Carol McLeod (1434)	Ms Barbara Fraser (1725)
Joanna Horner (1437)	Kathleen Oliver (1726)
Mr William I Jefferson (1441)	William Woods (1727)
Joan Kyle (1442)	Ms Sharon Ingram (1728)
Clemency Webb (1443)	Craig Hunter (1729)

<p> Mrs E Johnstone (1444) M Howe (1445) Mr Chris Carvil (1446) Mr Brian McAllister (1448) Colin Wade (1449) James McGhee (1450) Ms Alyson Craig (1451) Mary Chambers (1452) Ms Beth MacLeod (1453) Carole Cameron (1455) Mr Anthony Forbes (1456) Robert Sullivan (1457) Jennifer Cowan (1458) Margaret Barr (1459) W.J. Strawbridge (1460) Mrs C Wishart (1461) Mr Allan Black (1462) J MacLeod (1463) Morag Sinclair (1464) Robbie Wishart (1465) Ms Christine McCann (1466) </p>	<p> Robert Barr (1730) R.A. McGregor (1731) Donna Easton (1732) Margaret Stevenson (1733) Lesley Evangelista (1734) Ms Eileen Black (1735) Mr Connor McLean (1736) Dr William Manley (1737) Ms Moira Mckinnon (1738) Mr Leslie Forbes (1739) Lennox Webb (1740) Ms Julia Chandler (1741) Stephen Wright (1742) Mrs Julie Anne Gibb (1756) Linda Smith (1763) Niall MacLeod (1764) Russell Gibb (1769) Sherry Burns (1782) Mr Alan McPherson (1787) Mr Duncan Webb (1788) Robert Holmes (2106) </p>
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Issue 19	Merchiston Hospital, Brookfield	
Development plan reference:	Policy P3 – Additional Housing Site Schedule 1 – Additional Housing Sites – Redevelopment	Reporter: Philip Hutchinson
Body or person(s) submitting a representation raising the issue (including reference number):		
Bill Gallacher (171) Ken Maskery (220) Irene Campbell (281) Norman Sharp (283) Ian Blainey (286) Elaine Ewing (378) Elisabeth Fenwick (385) Caroline Ogilvy (394) Gordon Brown (395) Mary Lloyd (459) Jon Trinder (488) Vivienne Geddes (503)		Brookfield Community Council (504) Alastair McGregor (1731) Alister and Hazel Thomson (1870) Peter and Marion Kelt (1871) Mr and Mrs Gallagher (1873) NHS Greater Glasgow and the Clyde (1876) Margaret Dundas (1878) Craig Kennedy (1880) Councillor Allan Noon (2046) Paisley and Gryffe Transport Forum (2060)
Provision of the development plan to which the issue relates:	Released for housing under Policy P3 with indicative capacity for the site set out in Schedule 1	
Planning authority's summary of the representation(s):		
<p>Support for allocation of land at Merchiston</p> <p><u>NHS Greater Glasgow and the Clyde (1876)</u></p> <p>The Merchiston site offers an excellent opportunity to create a high quality residential development, respecting the setting and surrounding landscape of both Merchiston and Brookfield. The former hospital site is well defined within the former grounds of Merchiston House, with a well established mature landscape framework consisting of tree avenues and woodland.</p> <p>The site affords an opportunity to redevelop a brownfield site which is free from constraints related to slope, aspect, flood risk, contamination, ground stability and vehicular access.</p> <p>Redevelopment for residential use would significantly improve the amenity, public access, and enjoyment of the landscape areas within the site boundaries and, in particular, the retained open space between the proposed new development and Brookfield.</p> <p>The former Merchiston Hospital site is an effective housing site that can be delivered within the required 5 year time span.</p>		

Paisley and Gryffe Transport Forum (2060)

Support the site as it is adjacent to one of the rail transport arteries that could potentially be reopened in the long term.

Retirement Village

Bill Gallacher (171)

The former Merchiston Hospital site offers a unique opportunity to provide for the ageing communities of surrounding the site through the development of a retirement village. Retirement villages enhance the range of housing options available to older people, with a combination of independence and security, together with opportunities for social interaction and an active life all in one site.

The designation of the site as a retirement village will: make exceptional use of this unique site, provide additional specialised housing and residential care for the elderly and ageing population of thereby allowing release of the existing large housing in surrounding villages for larger families, contributing to the aims of the Council and Health Board by providing support services for the elderly.

Merchiston General

Margaret Dundas (1878), Councillor Allan Noon (2046)

Object to the use of greenbelt for the site proposed for development at Merchiston Hospital.

Caroline Ogilvy (394)

The land was originally gifted for a hospital on the strict proviso that it would be used solely for this purpose – this must be respected.

Flooding and Drainage and utilities

Irene Campbell (281), Ian Blainey (286), Elaine Ewing (378), Elisabeth Fenwick (385), Mary Lloyd (459), Vivienne Geddes (503), Brookfield Community Council (504), Alister Thomson (1870), Peter and Marion Kelt (1871), Mr and Mrs Gallagher (1873), Craig Kennedy (1880)

There are well documented issues with water and sewerage in Kilbarchan and Brookfield. Local water and particularly drainage and sewerage already exceed system capacity.

Traffic and Access

Ken Maskery (220), Irene Campbell (281), Ian Blainey (286), Elaine Ewing (378), Elisabeth Fenwick (385), Caroline Ogilvy (394), Gordon Brown (395), Mary Lloyd (459), Vivienne Geddes (503), Brookfield Community Council (504), Alister Thomson (1870), Peter and Marion Kelt (1871), Mr and Mrs Gallagher (1873), Craig Kennedy (1880)

The traffic infrastructure cannot sensitively accommodate an additional 200 unit development. Access to the proposed development and the additional traffic generated

on the heavily used Bridge of Weir Road and Barrochan Road is a concern and will add to the danger and safety of pedestrians, cyclists and other road users.

There is the requirement for major work to upgrade the existing infrastructure, the development just sets the scene for future problems instead of solving them. The Council would have to redevelop the road and roundabout, possibly including a new traffic management system. This would make the proposed scheme less financially viable to any developer.

Caroline Ogilvy (394)

The narrow drive to the west of the site from Bridge of Weir Road cannot support 2 way traffic and the preservation of the tree lined drive should not be widened as this would detrimentally affect the trees. The driveway has no paths and would constitute a safety hazard and should not be used for any redevelopment.

School Capacity

Ken Maskery (220)

Concern over the ability of existing educational establishments to provide places as they are already oversubscribed.

Impact on the village and landscape character

Norman Sharp (283), Ian Blainey (286), Elaine Ewing (378), Elisabeth Fenwick (385), Caroline Ogilvy (394), Gordon Brown (395), Mary Lloyd (459), Jon Trinder (488), Vivienne Geddes (503), Brookfield Community Council (504), Alastair McGregor (1731), Alister Thomson (1870), Peter and Marion Kelt (1871), Mr and Mrs Gallagher (1873), Craig Kennedy (1880)

The development will almost double the number of existing dwellings in Brookfield thereby causing a severe imbalance to existing amenities and there is the potential for strain on local services.

Building 200 units would significantly change Brookfield's character from a small separate community to a larger suburb of Johnstone. This would have an impact on the quality of life of residents.

Development of this site would completely ruin the Brookfield village environment overshadowing it, destroying the landscape character of this small enclave.

Coalescence

Caroline Ogilvy (394), Jon Trinder (488), Alastair McGregor (1731)

Development would significantly reduce the area of land separating the two settlements of Brookfield and Linwood resulting in Brookfield merging with Linwood losing its unique village identity.

The hospital land includes areas within the green belt that have never been previously developed and are essentially Greenfield. These areas should remain virgin and not be

used for additional housing. A smaller development would be more suited to the site encroaching on areas that currently do not have buildings.

Biodiversity

Caroline Ogilvy (394), Jon Trinder (488)

It would be detrimental to develop this beautiful site for housing rather than developing the flat fields to the west of Brookfield that offer no biodiversity. Merchiston Hospital is a perfect site to facilitate green corridors and biodiversity.

Commercial Opportunities

Caroline Ogilvy (394)

Reclamation yard to be retained for commercial use as small commercial opportunities are lacking in this area.

Procedure

Caroline Ogilvy (394)

Merchiston Drive is in the centre of this proposed redevelopment and has not been mentioned in the plan or in any of the supporting documents, and has often been included in error within the shading areas of maps as part of the redevelopment (including the map in the Notification of Publication of Proposed LDP).

Have not been consulted with at any stage prior to this and our needs and requirements have not been addressed.

Modifications sought by those submitting representations:

The Merchiston Hospital site should be designated for residential use as a retirement village. (171)

Remove completely Schedule 1 – Additional Housing sites – Redevelopment from the Plan (220)

No change suggested (281, 286, 395, 459, 503, 504, 1731, 1870, 1871, 1873, 1876, 1878, 1880, 2046, 2060)

Landscape the site and make suitable for children's play area and nature walk given its proximity to the cycle track (283)

Remove this site from the list of additional housing sites (385)

The Plan should be cancelled as there is inadequate road and water systems available in an already very congested area (378)

Merchiston Hospital be allowed to revert back to greenfield land, in order to preserve the relevance of the greenbelt in acting as a buffer to prevent merging of settlements and retain a significant area of land separating two communities. The expansion should not include greenfield land as there are areas within the hospital land that have never been

developed. The reclamation yard should be retained for commercial use (394)

A much smaller number of houses would have less of an impact but would need to be supported by: greatly improved access for pedestrians would be needed, for example pedestrian crossings at Deafhillock roundabout and Barrochan Road for access to the cycle path. Improved public transport for commuters (which would help reduce the traffic load) (488)

Summary of responses (including reasons) by planning authority:

Retirement Village (171)

Merchiston Hospital is a brownfield site that offers an opportunity for redevelopment to meet the identified housing land requirements. It is agreed that retirement villages can be seen as a way of enhancing the range of housing options available to older people. There are no details as to the range of house types/ size/ tenure, these details will be dealt with at later stages in the development process.

Flooding and Drainage (281, 286, 378, 385, 459, 503, 504, 1870, 1871, 1873, 1880)

There are technical solutions to resolve for the flooding and drainage concerns. Scottish Water confirmed that they will continue to work with the council and others to deliver sustainable development and will make no comment on any specific development site within the council boundary.

Traffic and Access (220, 281, 286, 378, 385, 394, 395, 459, 503, 504, 1870, 1871, 1873, 1880)

Development of the site offers the opportunity for improvement to existing infrastructure. Further details of the position of the access and junctions as well as the internal road layout and parking associated with the development will be required in order to provide a full traffic and transportation assessment through a detailed planning application.

School capacity (220)

There is capacity within schools in Renfrewshire to accommodate this development.

Impact on the village and landscape character (283, 286, 378, 385, 394, 395, 459, 488, 503, 504, 1731, 1870, 1871, 1873, 1878, 1880, 2046)

Merchiston Hospital closed in 2009 and the hospital buildings are now in a state of disrepair, subject to vandalism and are boarded up. The site is set within a well established, mature landscape and provides an opportunity to create a development that enhances the land adjacent to Brookfield which will have a positive visual impact, benefiting residential amenity and place making as a whole. There are opportunities to develop the Green Network through the protection and enhancement of the open space in the area, with links through the site connecting to surrounding areas.

Coalescence (394, 488, 1731)

This site is brownfield which has a number of buildings on the site. Redevelopment will not extend any further than the existing boundaries of the Merchiston Hospital site,

preventing coalescence of Brookfield and Linwood. The council's intention is to restrict development to the parts of the site that has existing buildings to ensure the landscape assets of the site are retained, with opportunities for significant enhancement.

Biodiversity (394, 488)

The site will be subject to a development brief which will ensure that the site is taken forward in line with the Local Development Plan Policies and Guidance, ensuring biodiversity is protected and enhanced.

Procedure (394)

The site was included within the Suggestion for Land Use Change (SLUC reference 5006) (CD/06) and has therefore been in the public domain at the Main Issues Report stage as well as within the proposed Local Development Plan, so members of the public have had the opportunity to comment on the site. Within the SLUC assessment, it excluded the existing residential properties on Merchiston Drive. Any future redevelopment of the site will not extend any further than the existing boundaries of the Merchiston Hospital site and, therefore, will not have a significant detrimental impact on the residential properties on Merchiston Drive.

Support for policy (1876, 2060)

The support for the policy is noted and welcomed.

Reporter's conclusions:

General Points & Procedural Matters

1. This extensive site is self-evidently redundant to the needs of NHS Greater Glasgow and The Clyde. The plan cannot reasonably insist that it is retained for NHS purposes. The terms on which the site was reportedly gifted for hospital purposes are not strictly relevant to the content of the proposed plan. Any associated title restrictions are for consideration elsewhere.
2. I have seen no convincing evidence that the site could not be effective within the life of the proposed plan. The footprints of the former hospital buildings (now partly cleared) the associated access roads, car parks etc mean that the central and eastern parts of the site are of brownfield character, in common with the reclamation yard in the north east corner. But for this last feature the perimeter itself is predominantly of greenfield character.
3. The development of 200 houses, concentrated on the brownfield parts of the site, would effectively create a satellite suburb fringed by green space potentially accommodating footpath links into the existing village. It is likely to have an individual identity, set apart, rather than appearing as a conventional extension of Brookfield. Handled in this way I fail to see how the proposed development should have any

significant adverse effect on the existing village environment. Extensive woodland lies between the brownfield core of the site (central and east of centre) and the existing village to the west.

4. Some sites of this scale and accessibility are bound to be required in order to deliver a generous supply of effective housing land. Retaining this allocation in the plan would remove the site from the Green Belt. It would however remain appropriate to safeguard against the suburbanisation of the predominantly greenfield (partly wooded) perimeter.

5. The site excludes existing houses west of Merchiston Drive. There is no reason why their environment need be adversely affected. It remains to be seen to what extent this particular entrance route will be relied upon. The site has been brought forward and assessed in a transparent and sufficiently thorough manner.

Retirement Village

6. This suggestion is not without its attractions. The site certainly has the potential to create a tranquil and semi-rural residential environment, given its predominantly greenfield perimeter. Its inclusion in Schedule 1 does not deny this option to the authority. The precise mix of tenure and house types are for later resolution through a combination of the promised development brief and planning applications.

Flooding and Drainage

7. I have seen no convincing evidence that the site is constrained in these respects. Until 2009 it accommodated an extensive hospital. For the greater part the brownfield parts of the site slope very gently away from the existing village. There are reports of flooding apparently due to surface water run off from the north as well as in the south east corner. However these areas account for only a tiny proportion of the site. These matters are not incompatible with the redevelopment of the brownfield parts of the site with 200 houses. This point is consistent with the preliminary position of Scottish Water.

Traffic and Access

8. Public anxiety over these matters is understandable. Bridge of Weir Road to the south and (to a lesser extent) Barrochan Road to the east were very busy on my inspection - even in mid-afternoon. However baseline traffic generation includes that of the former hospital, as well as current movements of heavy vehicles to and from the reclamation yard.

9. The development of the site should provide an opportunity to improve the access infrastructure on either frontage, even conceivably at the roundabout southeast of the site. The authority's assessments reveal no insuperable constraints in these respects. The future internal road layout, parking provision and junction arrangements are for resolution in the promised development brief and planning applications. These will clearly have to be supported by transportation assessments including proposals for mitigating impacts.

School Capacity

10. I am in no position to ignore the authority's insistence that there is sufficient school capacity for the pupil product of 200 houses. The site falls within the catchments of two

primary schools and two secondary schools, both denominational and non-denominational. Moreover 200 houses are highly unlikely to be occupied at a stroke within any one school year. The site would be built out in all probability over several school years. If a retirement village or even sheltered housing is included, the site's pupil product would obviously reduce.

Impact on the Village and on Landscape Character

11. I have substantially addressed these aspects above in paragraphs 2-4 above. The promised development brief should aim to retain as many mature trees as possible – hopefully maintaining a perimeter of predominantly greenfield or thoroughly landscaped character. I cannot envisage how there could be a major vehicular link directly across the west boundary - between the development and the existing village. However pedestrian access (e.g. to the village hall) and through the surviving green space would be desirable. I therefore fail to see how the village environment and local landscape character should experience any significant adverse impacts.

Coalescence

12. I have also substantially addressed this matter above in paragraphs 2-4. Because of the site history and in particular its brownfield component, this site represents a unique one-off development opportunity. The same cannot be said of any other significant area of ground between Brookfield and Linwood (or any other neighbouring settlement). The authority clearly intends that development should be basically focused on the brownfield (interior) parts of the site. I am therefore certain that the retention of this site within Schedule 1 involves no risk of coalescence.

Biodiversity

13. This aspect is more appropriately addressed in the promised development brief and in planning applications. It cannot reasonably amount to a significant constraint given the site history, its present character as a demolition site, and the authority's undertaking to focus development on those parts of the site previously occupied by hospital buildings and infrastructure. There is no reason why the site's biodiversity should suffer in any way. Only a limited proportion of it is likely to be developed.

Reporter's recommendations:

No modifications

Issue 20	Allocated Site: Abbey Road, Elderslie	
Development plan reference:	Policy P3 – Additional Housing Sites, Schedule 2	Reporter: Philip Hutchinson
Body or person(s) submitting a representation raising the issue (including reference number):		
Standard Letter: See Appendix 1 attached. <u>OTHER REPRESENTATIONS</u> Dawn Group Ltd [33] Mr Roger Riach [199] Mrs Isobel MacDonald [218] Mr Martin Dougall [225] Mr. Christopher Gresham [229] Mr Douglas Russell [239] Miss Emily Jayne Russell [241] Julia Doyle [242] Mr James Henderson [266] Mr Ian Ballantyne [270]	Mr Michael McGoldrick [282] Mrs Linda Motherwell [313] Mrs Linda Dunwoodie [447] Mr Kenneth Campbell [458] Mr Barry Holmes [491] Elderslie Green Belt petition [1820] (69 names) Omar Mahmood [1885] Morag Sibbald [1886] Elderslie Community Council [2059] Michelle Pasnik [2107]	
Provision of the development plan to which the issue relates:	Released for housing under Policy P3 with indicative capacity for the site set out in Schedule 2	
Planning authority's summary of the representation(s):		
<u>Support for allocation of land at Abbey Road, Elderslie</u> <u>Dawn Group Ltd (33)</u> Dawn Homes confirms its support for the identification of Abbey Road, Elderslie in Schedule 2 with an indicative capacity of 140 units. Dawn Homes conclude that the proposal for this site would be compliant with the relevant requirements of the Council's New Development Supplementary Guidance (SG) (CD/09). <u>Greenbelt and Landscape Character</u> <u>Elderslie Community Council (2059)</u> There is precious little separation along the sensitive southern edges of Paisley, Elderslie and Johnstone. Development of this greenbelt site will lead to further erosion and will simply erode the distinctive identities of the three communities. <u>Standard Letter (229, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1086, 1087, 1088, 1089, 1090, 1091,</u>		

1092, 1093, 1094, 1095, 1096, 1097, 1098, 1100, 1102, 1103, 1104, 1105, 1107, 1108, 1109, 1110, 1111, 1112, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1720, 197, 199, 222, 228, 230, 231, 233, 234, 238, 244, 245, 246, 247, 248, 249, 250, 251, 253, 254, 255, 256, 259, 260, 262, 263, 264, 265, 267, 268, 269, 271, 272, 273, 274, 275, 276, 277, 280, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 310, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 331, 332, 333, 334, 335, 336, 347, 348, 349, 350, 351, 352, 355, 356, 357, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 371, 372, 373, 374, 375, 376, 393, 397, 398, 399, 402, 403, 404, 406, 411, 412, 413, 414, 415, 417, 418, 419, 420, 422, 423, 424, 425, 427, 430, 432, 440, 441, 460, 461, 463, 464, 465, 466, 467, 468, 471, 472, 474, 481, 482, 484, 485, 1721, 1722, 1826, 1827, 1828, 208, 431, 470, 279, 258), Mr James Henderson (266), Mr Douglas Russell (239), Miss Emily Jayne Russell (241), Mr Ian Ballantyne (270), Mr Michael McGoldrick (282), Mr Barry Holmes (491), Mr. Christopher Gresham [229]

This proposal would result in one of the last remaining pieces of countryside between Paisley and Elderslie being replaced with housing. The proposed site does not meet the requirements detailed in the New Development SG (CD/09) under 'Acceptable Forms of development in the greenbelt'. There would be significant impact on the greenbelt at this location. Furthermore, it would be impossible for a housing development on this very prominent site to maintain and enhance the local landscape character and development would have significant impact on the local landscape setting.

Mr Martin Dougall (225)

From an aerial perspective it might seem that developing the Abbey Road site and so "tidying up" the boundary will not have much of an impact on the local residents, however, it is precisely the irregular nature of the boundary which brings the countryside close to the residents of urban areas like Elderslie.

Mr James Henderson (266)

Reduction in the greenbelt is a reduction in the amenities and open space of the area.

Mrs Linda Motherwell (313)

The local residents enjoy the open outlook that these fields provide and if the development went ahead it would change the feel of the village.

Mr Kenneth Campbell (458)

The proposal will result in a high density development in the greenbelt which is contrary to Scottish Planning Policy (CD/03).

Standard Letter (229, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076,

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1109, 1110, 1111, 1112, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123,
1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137,
1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151,
1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165,
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474, 481, 482, 484, 485, 1721, 1722, 1826, 1827, 1828, 208, 431, 470, 279, 258), Mr
James Henderson (266), Mr Michael McGoldrick (282), Mr Kenneth Campbell (458)

In terms of the development 'hierarchy', brownfield sites should be the priority which would allow important greenbelt sites such as Abbey Road to remain as they are.

Standard Letter (229, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062,
1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076,
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1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137,
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474, 481, 482, 484, 485, 1721, 1722, 1826, 1827, 1828, 208, 431, 470, 279, 258)

It is noted that the 'Strategic Greenbelt Review' (CD/49) references Elderslie as generally classed as 'A' status meaning '...greenbelt boundary is relatively robust, therefore release of land for development is not likely to be acceptable'.

Biodiversity/ Flora / Fauna

Standard Letter (229, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076,

1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1100, 1102, 1103, 1104, 1105, 1107, 1108, 1109, 1110, 1111, 1112, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1720, 197, 199, 222, 228, 230, 231, 233, 234, 238, 244, 245, 246, 247, 248, 249, 250, 251, 253, 254, 255, 256, 259, 260, 262, 263, 264, 265, 267, 268, 269, 271, 272, 273, 274, 275, 276, 277, 280, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 310, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 331, 332, 333, 334, 335, 336, 347, 348, 349, 350, 351, 352, 355, 356, 357, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 371, 372, 373, 374, 375, 376, 393, 397, 398, 399, 402, 403, 404, 406, 411, 412, 413, 414, 415, 417, 418, 419, 420, 422, 423, 424, 425, 427, 430, 432, 440, 441, 460, 461, 463, 464, 465, 466, 467, 468, 471, 472, 474, 481, 482, 484, 485, 1721, 1722, 1826, 1827, 1828, 208, 431, 470, 279, 258), Morag Sibbald (1886), Mr Martin Dougall (225), Miss Emily Jayne Russell (241), Julia Doyle (242), Mr Michael McGoldrick (282), Elderslie Green Belt petition (1820), Mr Barry Holmes (491)

The site supports a diverse range of wildlife, habitats and biodiversity, this will be altered or lost through development.

Mr Kenneth Campbell (458)

It is not clear whether the appropriate environmental surveys have been conducted to determine the extent of natural qualities that would be destroyed by the proposal.

Suitability of Site

Standard Letter (229, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1100, 1102, 1103, 1104, 1105, 1107, 1108, 1109, 1110, 1111, 1112, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1720, 197, 199, 222, 228, 230, 231, 233, 234, 238, 244, 245, 246, 247, 248, 249, 250, 251, 253, 254, 255, 256, 259, 260, 262, 263, 264, 265, 267, 268, 269, 271, 272, 273, 274, 275, 276, 277, 280, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 310, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 331, 332, 333, 334, 335, 336, 347, 348, 349, 350, 351, 352, 355, 356, 357, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 371, 372, 373, 374, 375, 376, 393, 397, 398, 399, 402, 403, 404, 406, 411, 412, 413, 414, 415, 417, 418, 419, 420, 422, 423, 424, 425, 427, 430, 432, 440, 441, 460, 461, 463, 464, 465, 466, 467, 468, 471, 472, 474, 481, 482, 484, 485, 1721, 1722, 1826, 1827, 1828, 208, 431, 470, 279, 258), Mr

Martin Dougall (225), Mr James Henderson (266), Morag Sibbald (1886), Mr Michael McGoldrick (282), Mrs Linda Dunwoodie (447), Mr Barry Holmes (491), Elderslie Community Council (2059)

The site is within a confirmed former mining area which has been identified by the Coal Authority as a "Development High Risk Area". Previous mining activity should be considered for its impact on proposed building work and the subsequent security of houses.

Standard Letter (229, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1100, 1102, 1103, 1104, 1105, 1107, 1108, 1109, 1110, 1111, 1112, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1720, 197, 199, 222, 228, 230, 231, 233, 234, 238, 244, 245, 246, 247, 248, 249, 250, 251, 253, 254, 255, 256, 259, 260, 262, 263, 264, 265, 267, 268, 269, 271, 272, 273, 274, 275, 276, 277, 280, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 310, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 331, 332, 333, 334, 335, 336, 347, 348, 349, 350, 351, 352, 355, 356, 357, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 371, 372, 373, 374, 375, 376, 393, 397, 398, 399, 402, 403, 404, 406, 411, 412, 413, 414, 415, 417, 418, 419, 420, 422, 423, 424, 425, 427, 430, 432, 440, 441, 460, 461, 463, 464, 465, 466, 467, 468, 471, 472, 474, 481, 482, 484, 485, 1721, 1722, 1826, 1827, 1828, 208, 431, 470, 279, 258)

The site is constrained by topographic issues and therefore development platforms would need to be created to facilitate development.

Standard Letter (229, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1100, 1102, 1103, 1104, 1105, 1107, 1108, 1109, 1110, 1111, 1112, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1720, 197, 199, 222, 228, 230, 231, 233, 234, 238, 244, 245, 246, 247, 248, 249, 250, 251, 253, 254, 255, 256, 259, 260, 262, 263, 264, 265, 267, 268, 269, 271, 272, 273, 274, 275, 276, 277, 280, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 310, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 331, 332, 333, 334, 335, 336, 347, 348, 349, 350, 351, 352, 355, 356, 357, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 371, 372, 373, 374, 375, 376, 393, 397, 398, 399, 402, 403, 404, 406, 411, 412, 413, 414, 415, 417, 418, 419, 420, 422, 423, 424, 425, 427, 430, 432, 440, 441, 460, 461, 463, 464, 465, 466, 467, 468, 471, 472,

474, 481, 482, 484, 485, 1721, 1722, 1826, 1827, 1828, 208, 431, 470, 279, 258), Mr James Henderson (266), Mr Michael McGoldrick (282), Mr Kenneth Campbell (458), Elderslie Community Council (2059)

Comprehensive drainage infrastructure would have to be installed on site as this area is known to collect surface water and there is substantial water run-off from these fields. In addition, parts of the site appear to lie within the flood envelope of the Indicative River & Coastal Flood Map (Scotland). Scottish Planning Policy (CD/03) states that development should not take place on such land that could otherwise contribute to managing flood risk. Significant groundwork would be required to address these issues. A risk exists that adjacent and surrounding land and properties could be affected by such works.

Traffic/Access

Standard Letter (229, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1100, 1102, 1103, 1104, 1105, 1107, 1108, 1109, 1110, 1111, 1112, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1288, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1340, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1348, 1349, 1350, 1351, 1352, 1353, 1354, 1355, 1356, 1357, 1358, 1359, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 1388, 1389, 1390, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1399, 1400, 1401, 1402, 1403, 1404, 1405, 1406, 1407, 1408, 1409, 1410, 1411, 1412, 1413, 1414, 1415, 1416, 1417, 1418, 1419, 1420, 1421, 1422, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1430, 1431, 1432, 1433, 1434, 1435, 1436, 1437, 1438, 1439, 1440, 1441, 1442, 1443, 1444, 1445, 1446, 1447, 1448, 1449, 1450, 1451, 1452, 1453, 1454, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1483, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 1519, 1520, 1521, 1522, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1532, 1533, 1534, 1535, 1536, 1537, 1538, 1539, 1540, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1548, 1549, 1550, 1551, 1552, 1553, 1554, 1555, 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1722, 1723, 1724, 1725, 1726, 1727, 1728, 1729, 1730, 1731, 1732, 1733, 1734, 1735, 1736, 1737, 1738, 1739, 1740, 1741, 1742, 1743, 1744, 1745, 1746, 1747, 1748, 1749, 1750, 1751, 1752, 1753, 1754, 1755, 1756, 1757, 1758, 1759, 1760, 1761, 1762, 1763, 1764, 1765, 1766, 1767, 1768, 1769, 1770, 1771, 1772, 1773, 1774, 1775, 1776, 1777, 1778, 1779, 1780, 1781, 1782, 1783, 1784, 1785, 1786, 1787, 1788, 1789, 1790, 1791, 1792, 1793, 1794, 1795, 1796, 1797, 1798, 1799, 1800, 1801, 1802, 1803, 1804, 1805, 1806, 1807, 1808, 1809, 1810, 1811, 1812, 1813, 1814, 1815, 1816, 1817, 1818, 1819, 1820, 1821, 1822, 1823, 1824, 1825, 1826, 1827, 1828, 1829, 1830, 1831, 1832, 1833, 1834, 1835, 1836, 1837, 1838, 1839, 1840, 1841, 1842, 1843, 1844, 1845, 1846, 1847, 1848, 1849, 1850, 1851, 1852, 1853, 1854, 1855, 1856, 1857, 1858, 1859, 1860, 1861, 1862, 1863, 1864, 1865, 1866, 1867, 1868, 1869, 1870, 1871, 1872, 1873, 1874, 1875, 1876, 1877, 1878, 1879, 1880, 1881, 1882, 1883, 1884, 1885, 1886, 1887, 1888, 1889, 1890, 1891, 1892, 1893, 1894, 1895, 1896, 1897, 1898, 1899, 1900, 1901, 1902, 1903, 1904, 1905, 1906, 1907, 1908, 1909, 1910, 1911, 1912, 1913, 1914, 1915, 1916, 1917, 1918, 1919, 1920, 1921, 1922, 1923, 1924, 1925, 1926, 1927, 1928, 1929, 1930, 1931, 1932, 1933, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1942, 1943, 1944, 1945, 1946, 1947, 1948, 1949, 1950, 1951, 1952, 1953, 1954, 1955, 1956, 1957, 1958, 1959, 1960, 1961, 1962, 1963, 1964, 1965, 1966, 1967, 1968, 1969, 1970, 1971, 1972, 1973, 1974, 1975, 1976, 1977, 1978, 1979, 1980, 1981, 1982, 1983, 1984, 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059), Mr James Henderson (266), Mr Martin Dougall (225), Miss Emily Jayne Russell (241), Mr Michael McGoldrick (282), Elderslie Green Belt petition (1820), Mr Barry Holmes (491), Mr Kenneth Campbell (458), Elderslie Community Council (2059)

Development will lead to construction traffic and increased car use which will impact on pedestrian and road safety and the condition of the roads. The policy does not indicate the level of economic investment required to improve the road and local infrastructure network surrounding the site.

Mr James Henderson (266), Mr. Christopher Gresham (229), Mr Kenneth Campbell (458)

Increased traffic will substantially raise the noise and air pollution levels in the surrounding area. Concern over the impact this will have on the residents of Elderslie and detrimental effect to the existing wildlife and their associated habitats.

School Capacity

Standard Letter (229, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062,

1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1100, 1102, 1103, 1104, 1105, 1107, 1108, 1109, 1110, 1111, 1112, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1720, 197, 199, 222, 228, 230, 231, 233, 234, 238, 244, 245, 246, 247, 248, 249, 250, 251, 253, 254, 255, 256, 259, 260, 262, 263, 264, 265, 267, 268, 269, 271, 272, 273, 274, 275, 276, 277, 280, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 310, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 331, 332, 333, 334, 335, 336, 347, 348, 349, 350, 351, 352, 355, 356, 357, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 371, 372, 373, 374, 375, 376, 393, 397, 398, 399, 402, 403, 404, 406, 411, 412, 413, 414, 415, 417, 418, 419, 420, 422, 423, 424, 425, 427, 430, 432, 440, 441, 460, 461, 463, 464, 465, 466, 467, 468, 471, 472, 474, 481, 482, 484, 485, 1721, 1722, 1826, 1827, 1828, 208, 431, 470, 279, 258), Michelle Pasnik (2107), Mrs Isobel MacDonald (218), Mrs Linda Motherwell (313), Morag Sibbald (1886), Mr Martin Dougall (225), Miss Emily Jayne Russell (241), Mr Michael McGoldrick (282), Elderslie Green Belt petition (1820), Mr Barry Holmes (491), Mr Kenneth Campbell (458), Elderslie Community Council (2059)

Concerned that the existing school and nursery within the catchment would not be able to support the proposed development as they already operate at capacity. Should children have to attend other schools out with the catchment this will compound the suggested traffic issues. Furthermore, it is not clear who would fund extensions/upgrades to these facilities.

Local Amenities

Standard Letter (229, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1100, 1102, 1103, 1104, 1105, 1107, 1108, 1109, 1110, 1111, 1112, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1720, 197, 199, 222, 228, 230, 231, 233, 234, 238, 244, 245, 246, 247, 248, 249, 250, 251, 253, 254, 255, 256, 259, 260, 262, 263, 264, 265, 267, 268, 269, 271, 272, 273, 274, 275, 276, 277, 280, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 310, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 331, 332, 333, 334, 335, 336, 347, 348, 349, 350, 351, 352, 355, 356, 357, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 371, 372, 373, 374, 375, 376, 393, 397, 398, 399, 402, 403, 404, 406, 411, 412, 413, 414, 415, 417, 418, 419, 420, 422, 423, 424, 425, 427, 430, 432, 440, 441, 460, 461, 463, 464, 465, 466, 467, 468, 471, 472, 474, 481, 482, 484, 485, 1721, 1722, 1826, 1827, 1828, 208, 431, 470, 279, 258), Mrs

Isobel MacDonald (218), Mrs Linda Motherwell (313), Morag Sibbald (1886), Mr Martin Dougall (225), Mr Michael McGoldrick (282), Mr Barry Holmes (491)

This proposal would involve building more houses at a time when amenities within Elderslie are closing and the area is dependent on amenities located in nearby settlements such as Johnstone, Linwood and Paisley. Replacement facilities elsewhere are not a substitute for local amenities.

Mr. Christopher Gresham (229), Mr Kenneth Campbell (458)

➤ There would appear to be no detailed proposals to provide any additional provisions within the community directly and with such a proposed increase in village residents this will surely be detrimental to retaining and enhancing the social and economic character of the village.

Elderslie Community Council (2059)

➤ It is 1,000 metres on foot from the closest part of the site to Elderslie village centre, and 700m to the nearest shop. Few people are going to walk that far to use shops and community facilities. Realistically, the location of the site is going to fuel car-dependent lifestyles for residents. That is at odds with all current planning and transport strategy and policy.

Scale of Development

Mr Martin Dougall (225), Mrs Isobel MacDonald (218), Mr James Henderson (266)

The scale of development is unable to be supported by existing infrastructure, services and facilities.

Standard Letter (229, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1100, 1102, 1103, 1104, 1105, 1107, 1108, 1109, 1110, 1111, 1112, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1720, 197, 199, 222, 228, 230, 231, 233, 234, 238, 244, 245, 246, 247, 248, 249, 250, 251, 253, 254, 255, 256, 259, 260, 262, 263, 264, 265, 267, 268, 269, 271, 272, 273, 274, 275, 276, 277, 280, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 310, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 331, 332, 333, 334, 335, 336, 347, 348, 349, 350, 351, 352, 355, 356, 357, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 371, 372, 373, 374, 375, 376, 393, 397, 398, 399, 402, 403, 404, 406, 411, 412, 413, 414, 415, 417, 418, 419, 420, 422, 423, 424, 425, 427, 430, 432, 440, 441, 460, 461, 463, 464, 465, 466, 467, 468, 471, 472, 474, 481, 482, 484, 485, 1721, 1722, 1826, 1827, 1828, 208, 431, 470, 279, 258), Mr Michael McGoldrick (282), Mr Kenneth Campbell (458)

Should the greenbelt release go ahead, there are concerns that given the size of the site

the amount of units proposed would significantly increase at planning application stage.

➤ Development Viability



Mr Martin Dougall (225), Mrs Isobel MacDonald (218), Mr James Henderson (266)



Concerns that the required additional provisions in terms of infrastructure, services and facilities cannot be economically justified without the existing residents being disadvantaged.

Elderslie Community Council (2059)

Concerns regarding the viability of the development as substantial investment from the developer would be required to address the existing constraints on this site.

General

Elderslie Community Council (2059)

This site now proposed for release was not shown on the MIR plan (it lies underneath the plan legend), so the Community Council had no inkling that green belt release was a possibility. Since the MIR stage is arguably the most appropriate time to discuss important issues like that, not raising the possibility of green belt release around Elderslie in the MIR seems a lost opportunity.

Mr Roger Riach (199)

Home values will be drastically affected by the development.

Julia Doyle (242)

Elderslie will lose its unique nature.

Mr Roger Riach (199), Miss Emily Jayne Russell (241)

Beautiful views currently enjoyed by houses which back onto this site will be lost.

Omar Mahmood (1885)

The Council's plans to make a beautiful area of Elderslie into a council development are ludicrous.

Modifications sought by those submitting representations:

Delete in its entirety the item starting 'Abbey Road, Elderslie' in Schedule 2 - Additional Housing Sites - Greenfield, on page 30 of the Proposed Local Development Plan.
(Standard Letter (229, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1100, 1102, 1103, 1104, 1105, 1107, 1108, 1109, 1110, 1111, 1112, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137,

1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1720, 197, 199, 222, 228, 230, 231, 233, 234, 238, 244, 245, 246, 247, 248, 249, 250, 251, 253, 254, 255, 256, 259, 260, 262, 263, 264, 265, 267, 268, 269, 271, 272, 273, 274, 275, 276, 277, 280, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 310, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 331, 332, 333, 334, 335, 336, 347, 348, 349, 350, 351, 352, 355, 356, 357, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 371, 372, 373, 374, 375, 376, 393, 397, 398, 399, 402, 403, 404, 406, 411, 412, 413, 414, 415, 417, 418, 419, 420, 422, 423, 424, 425, 427, 430, 432, 440, 441, 460, 461, 463, 464, 465, 466, 467, 468, 471, 472, 474, 481, 482, 484, 485, 1721, 1722, 1826, 1827, 1828, 208, 431, 470, 279, 258), 266, 239, 225, 241, 270, 282, 491, 458)

Remove the P3 residential designation from Abbey Road, and identify the site as greenbelt. (2059)

No change suggested by all other representations.

Summary of responses (including reasons) by planning authority:

Allocation of land for housing at Abbey Road (All Representations)

In accordance with Scottish Planning Policy and Planning Advice Note (PAN) 2/2010 (CD/42), Renfrewshire's Local Development Plan requires to indicate a generous and effective supply of land for housing. The figures set out in the proposed Glasgow and the Clyde Valley Strategic Development Plan (CD/02) forecast in the Housing Need and Demand Assessment (CD/37), which were translated at a local level into the Housing Supply Targets, set out in the draft Renfrewshire Local Housing Strategy 2011 – 2016 (CD/39) and were taken to inform the Renfrewshire Local Development Plan Main Issues Report (MIR) (CD/05). At the consultation stage of the MIR in December 2011 (CD/05), it was indicated that additional land would require to be identified to provide a generous and effective housing land supply. Brownfield and green belt sites were identified to meet the overall housing land requirement set at that time, Abbey Road was not considered as being required to meet this requirement. However, since the consultation on the MIR and the production of the proposed Renfrewshire Local Development Plan through 2012 there have been some changes, alterations and updates that required to be taken into account which has meant that more green belt land is required to be identified to meet Renfrewshire's housing land requirements. The following changes/updates required to be considered in the production of the proposed LDP:

- The 2012 Housing Land Audit (CD/38) indicated a decrease in effective land supply, as in the current economic climate some sites would no longer be considered effective and deliverable within 5 years of the plan. This was agreed through discussion with Homes For Scotland;
- A decrease in the number of sites in the housing land supply which were considered as being no longer able to become effective within the plan period;
- In line with the average outputs of housebuilders, the programming for many large sites was decreased to a maximum 25 units per annum per housebuilder which meant substantial reduction in programming for Bishopton and

Johnstone South West Community Growth Areas as well as Renfrew North sites;

- The housing supply targets in the finalised Renfrewshire Local Housing Strategy (CD/39) had increased in line with the final indicative all-tenure housing requirement as set out in the adopted Glasgow and the Clyde Valley Strategic Development Plan (CD/02), therefore, the housing land requirements in the LDP required to increase; and,
- Providing a generous supply of land for housing was indicated at anything up to 20% above the housing supply target, this required to be identified in the proposed LDP.

Therefore as set out on Page 27 of the proposed LDP, there was a need to address a shortfall in the supply of land for housing from the sites identified to the Council through the Suggestions for Land Use Change and the MIR submissions. It was considered that the Abbey Road site was one of nine sites that are appropriate for release for housing in terms of both planning and environmental considerations. Sites submitted for a change in land use allocation went through a land use consideration planning sustainability assessment (CD/06), a strategic environmental assessment (CD/07), a landscape assessment (CD/08) and consultation on the MIR (CD/05) to assess the suitability of the site for development. The sites chosen for green belt release were identified to help deliver sustainable communities that are in places which offer a high quality of life with a wide range of existing assets. The suitability of the site is addressed further in response to the representations made with respect to the site.

Dawn Group Ltd (33)

Support for the allocation of this site as an additional housing site is noted and welcomed.

Greenbelt and Landscape Character (Standard Letter, 266, 239, 241, 270, 282, 491, 229, 225, 313, 458, 2059)

The proposed Local Development Plan (LDP) Strategy is to focus development on brownfield sites first, however, Policy P3 does identify additional greenfield sites to provide a range and choice of effective sites in line with the above comments on the allocation of this site. It was considered that this site has the ability to integrate well with the surrounding area and add a positive element to the place. This area has been removed from the green belt in the proposed LDP, therefore, any consideration of this site against the requirements of the New Development Supplementary Guidance (SG) (CD/09) under 'Acceptable Forms of development in the greenbelt' is not relevant. In addition, the identification of Abbey Road as an additional housing site in the proposed LDP does not contradict the contents of the 'Strategic Green belt Review' (CD/49), as this land is clearly identified within this report as a site which is suitable for release from the green belt.

The independent landscape assessment (CD/08) carried out on behalf of the council concludes that parts of the site maybe suitable for development, however, areas of the site are sensitive and should be retained and mitigation measures would be required to maintain the character of the settlement / green belt. The landscape assessment (CD/08) was fully considered in reaching the conclusion that this is a suitable housing site. While it is agreed that it is a locally prominent site, it is considered that the existing landscape, supplemented by additional landscape measures, would have the capacity to accommodate development without impinging on the landscape setting or green belt

boundary in this area. The tree belt, along the western boundary, is a significant feature which requires to be retained and more robust planting along the southern boundary would be required to redefine the settlement boundary. The site connects visually and physically with the settlement edge and will improve access to open space in this area. While an area of greenbelt would be lost, this development offers an opportunity to add to the existing place while providing a new robust green belt boundary to the south. It has the ability to be designed to relate well to existing housing whereby neighbouring residents would not suffer a serious loss of amenity. The mix, density, design, layout, access and landscaping arrangements will be detailed through a planning application.

Development of this site would not lead to coalescence between Elderslie and either Johnstone or Paisley. It is bound on three sides by residential and open fields would remain to the south. A robust green belt boundary could be created along the southern boundary of this site to redefine the settlement edge.

Biodiversity/ Flora / Fauna (Standard Letter, 1886, 225, 241, 242, 282, 1820, 491, 458)

Biodiversity/Flora/Fauna issues associated with the development of this site were considered as part of the strategic environmental assessment (CD/07) which didn't raise any significant issues. Any development proposal for this site will be assessed in line with the LDP policies and the New Development SG (CD/09) ensuring biodiversity is protected and enhanced.

Suitability of Site

Standard Letter, 225, 266, 1886, 282, 447, 491, 2059

British Coal in their response to a previous planning application submitted for this site confirmed that they have no record of past mining under the site, however, shallow seams could be present given the mining history in this area. The developer confirms that this is an effective site capable of being developed in the plan period and did not state that ground condition is an issue to prevent development.

Standard Letter

It is agreed that land platforms will be required in developing this site. This is a common requirement on most development sites and is not seen as a constraint to development.

Standard Letter, 266, 282, 458, 2059

There are technical solutions to resolve the flooding and drainage concerns. Scottish Water has agreed that they will work with developers to deliver sites which may require developers to provide the necessary infrastructure or services, or a contribution towards its provision, in order to mitigate the impact of development. It is envisaged that the required mitigation works could be undertaken without having a detriment impact on neighbouring properties.

Traffic/Access (Standard Letter, 266, 225, 241, 282, 1820, 491, 458, 2059, 229)

Development of the site offers the opportunity for improvement to existing infrastructure. Further details of the position of the access and junctions as well as the internal road layout and parking associated with the development will be required in order to provide a

full traffic and transportation assessment through a detailed planning application. It is agreed that this development will inevitably result in an increase in car use in the area; however, it is considered that this development represents a sustainable expansion of Elderslie which is well served by public transport. Detailed issues such as noise and air quality will be addressed by a planning application; however, the strategic environmental assessment (CD/07) did not raise any significant issues in this respect.

School Capacity (Standard Letter, 2107, 218, 313, 1886, 225, 241, 282, 1820, 491, 458, 2059)

Capacity exists within existing primary and secondary schools.

Local Amenities (Standard Letter, 218, 313, 1886, 225, 282, 491, 229, 458, 2059)

It is considered that existing services and facilities could accommodate the development without significant impact. See the Funding of Infrastructure and Services section below. It is recognised that there is a need for positive enhancement of the range of facilities / services as well as the physical fabric and public realm of Elderslie Centre. Actions will be identified, in the LDP Action Programme (CD/01), to develop in partnership with the community and others, a range of initiatives which will help to promote development and enhancement of each town and village centre. (See Issue 45)

It is agreed that the site is approximately 1,000 metres on foot from the closest part of the site to Elderslie village centre and 700m to the nearest shop, however, the development of this site is not at odds with current planning and transport strategy and policy. The site is easily within walkable distance to the nearest bus stop, playing fields/open space and local school and is also accessible to the village centre in terms of Planning Advice Note (PAN) 75 - Planning For Transport (CD/50) which suggests a maximum threshold of 1600m for walking is broadly in line with observed travel behaviour. While this development will result in an increase in car movements in and around this area it is not considered that the location of the site will fuel car-dependent lifestyles for residents.

Funding of Infrastructure and Services (Standard Letter, 225, 218, 266, 2059, 229, 458, 313, 1886, 282, 491, 2107, 241, 1820)

It is noted that a number of representations raise concerns about the funding of infrastructure and services improvements, including traffic management and schools, should they be required to support the development of this site. The proposed LDP states that developers will require to make good any infrastructure deficits associated with any new development, in terms of required infrastructure, facilities, services, traffic management measures and other requirements to support expanded communities and the scale and type of development proposed. This will ensure that the infrastructure, services and facilities will be provided to support this new development.

Scale of Development

➤ 225, 218, 266

➤ It is considered that this development could be supported by existing public transport infrastructure while existing services and facilities including schools could accommodate the development without significant impact. Other requirements such as water and roads infrastructure can be dealt with by the developer, as it would do with any

other development proposal.

Standard Letter, 282, 458

Schedule 2 – Additional Housing Sites – Greenfield, in the proposed LDP, details an indicative capacity for the Abbey Road site of 140 units. This capacity is indicative and may change slightly once a detailed layout is submitted at planning application stage, however, any proposal will be required to reflect the density of the neighbouring residential area. Details such as layout and density will be fully addressed by a planning application in line with the LDP's Places Strategy.

➤ Development Viability (225, 218, 266 2059)

Issues including the mining history and flooding and drainage will require further investigation at planning application stage, however, it is considered that there are no insurmountable constraints which would prevent this development taking place during the plan period. In line with Proposal P3, should development not occur within the lifetime of this plan, this site will revert back to a green belt land use designation.

General

2059

This site was submitted as part of the Suggestions for Land Use Change process which preceded the publication of the Main Issues Report (MIR). This site was assessed at this stage as detailed in Background Paper 15 – Site Assessments, land use considerations planning sustainability assessment (CD/6), strategic environmental assessment (CD/7) and the landscape assessment (CD/8) which accompanied the MIR (CD/05) and it was identified as a site that would be required as part of Alternative Housing Strategy 1. With regards to Diagram 25 within the MIR, this site was not shown as it was not identified as a preferred housing site.

199

The affect that development of this site would have on home values is not a planning consideration and has not formed part of the assessment on this site.

242, 199, 241, 1885

Although this allocation will result in an area of green belt being lost, this development offers an opportunity to add to the existing place without significantly altering the character or setting of Elderslie. The site has the ability to be designed to relate well to existing housing whereby neighbouring residents would not suffer a significant loss of amenity.

All Representations

In conclusion, this site emerged as a desirable option because there are relatively few planning and environmental constraints and those that do exist can be dealt with and resolved. Although this allocation will result in the loss of green belt land, given the requirement to provide a generous and effective supply of housing land and the extensive site assessments carried out by the Council, the location and scale can be justified. For the reasons outlined above this site will remain zoned as a housing site.

Reporter's conclusions:

Reasons for allocation of site

1. The plan must allocate a generous and effective supply of housing land, and the MIR recognised that both brownfield and greenfield sites would have to be identified. This particular site was not targeted at that time. Since then new factors have had to be taken into account, the upshot being additional sites. Firstly, some sites which were considered effective in the 2012 Housing Land Audit can long longer be regarded as effective *within 5 years* given the current economic climate (although there are signs that this is beginning to improve). Likewise large sites have demonstrated slower rates of development - now taken as a maximum of 25 units per year per house-builder. Also, the housing supply targets in the finalised local housing strategy increased, in order to conform to the adopted strategic development plan. Finally a spare margin of up to 20% over target is needed to provide the mandatory generous and effective supply.
2. This particular site accordingly emerged as one of several considered suitable for release, following 4 stages of assessment. It is effective, being subject to developer interest. Any effect on the value of neighbouring properties is not material, and this factor formed no part of the assessment process.
3. The site was not identified within the MIR but emerged from the "Suggestions for Land Use Change" process. Following assessment it was identified as a site which could be brought forward as part of Alternative Housing Strategy 1 in response to the above factors.

Greenbelt and Landscape Character

4. The plan focuses firstly on the release of brownfield sites, but this does not mean that greenfield sites can be avoided, even in the green belt. It is proposed to remove this particular site from the green belt. Therefore its allocation for housing does not have to meet the strict criteria applicable to development proposals in the greenbelt. The green belt boundary will change when the plan is adopted with this site allocated. It emerged from the Strategic Greenbelt Review that on the south side of Johnstone and Elderslie the green belt boundary has certain strengths and weaknesses, with 50% being defined by residential back gardens. The grant of 'B' status to this sector in the said review means that it has potential for small scale developments, limited to discrete sites. I consider this to be such a site.
5. This site is bounded on 3 sides by residential development. Abbey Road (which carries a bus route) defines its northern boundary which is the inner-most boundary relative to the built up area. The revised green belt boundary would have a total length of about 230 metres, as opposed to the present length of over 600 metres. The revised green belt boundary will almost follow a crest in the landscape, south of which lies a mature hedge. In these respects I consider the revised green belt boundary to be more defensible and generally far superior to that which exists. The release of this site cannot increase any risk of coalescence between Elderslie and any other community.
6. The above factors outweigh the loss of an otherwise agreeable green 'wedge' of farmland penetrating the built up area. This is in any case an unusual 'wedge' since it broadens out very significantly the deeper it penetrates the built up area.

7. Although the site is locally prominent, the existing landscape - with suitable enhancements - can contribute to an agreeable development, conservatively pitched at about 25 houses per hectare. This should leave adequate scope for new and enhanced landscaping within the development. The allocation of 140 units to this site appears to be in tune with the topography and the densities of adjacent housing areas. This number is substantially less than reportedly proposed by a previous potential developer.

8. The tree belt on the west boundary should be retained. This is what the potential developer proposes. In addition the hedge on the south boundary should be enhanced, to help reinforce an inevitably more robust and defensible green belt boundary. This is also what the potential developer has in mind,

9. Apart from a change in their presently semi-rural views existing residents should not experience any significant reductions in amenity. Although a loss of view is not normally a valid consideration, landscaping and layout details will require exceptional care at planning application stage.

10. Although approximately 6.5 hectares of existing green belt would be lost this housing site will allow Elderslie to expand without significantly changing its character or setting. Neighbouring housing development need not be unreasonably disadvantaged, given careful design of the development.

Biodiversity / Flora / Fauna

11. Although the existing hedgerows doubtless function as wildlife corridors to some extent, the stronger examples need not be lost. However the site is basically rough grazing and lacks any natural heritage designations. It appears no more remarkable for its natural heritage interest than many another edge-of-settlement greenfield site in Renfrewshire.

Ground conditions and surface water

12. In common with several other sites there is no record of past mining under the site, but there remains the possibility of unrecorded shallow workings. The potential developer is aware of this point but still regards this as an effective site capable of being developed within the plan period. The contours will presumably require remodelling in order to accommodate development on topographical platforms. However, this is by no means unusual and should not be treated as a serious constraint.

13. Technical solutions are available to address flooding and drainage issues in accordance with Sustainable Urban Drainage [SUDS] principles. Scottish Water is content - although not ruling out the possibility of developer contributions.

Traffic / Access

14. Full details of any off-site improvements, the position of access junctions, the internal road layout, parking provision and air quality can be expected to be clarified and resolved at planning application stage. Such an application is likely to need to be supported by a full traffic and transportation assessment. It would be exceptional to demand that these matters are addressed and resolved at this stage. The site is served by public transport, but it is inevitable that its occupants will be heavily car-dependent. This would be the case with any edge-of-settlement greenfield release.

School capacity

15. The authority confirms that there is sufficient school capacity (both primary and secondary) to accommodate the pupil product of this site. I see no reason to reject that confirmation. The site will not be built out instantly as a single sudden event. In other words the pupil product will be absorbed over several years.

Local amenities

16. I see no reason why existing services and facilities in Elderslie should not accommodate the development as the site is gradually built out without significant impacts. Measures to enhance the physical fabric and public realm of Elderslie will be identified in the Action Programme associated with the proposed plan. This site is close to a bus stop, and other services are within reasonable reach. Any sizeable edge-of-settlement greenfield housing site is bound to share similar or more remote relationships with local services. No public open space would be lost, but it remains possible that a housing layout could improve local provision.

Funding of infrastructure, services and scale of development

17. The proposed plan does not include a general policy on developer contributions as defined in the glossary on page 34 of the plan. However, it is made clear on page 23 of the proposed plan that developers “will still require to make good any infrastructure deficits associated with any new development, in terms of infrastructure, facilities, services, traffic management measures or other arrangements...”.

18. The indicative capacity of the site is 140 units, but it is not unusual for the precise figure to be refined at the detailed planning stage. I would expect any proposal to reflect the densities of adjacent residential areas. This is the approach taken in the indicative layout submitted by the potential developer.

Development viability

19. Matters such as ground conditions and surface water disposal will require detailed attention in the preparation - and assessment - of planning applications. At this stage no insurmountable constraints are foreseen. This is consistent with the existence of longstanding housing development on 3 sides of the site. With a potential developer supporting this part of the proposed plan, it appears very unlikely that this site would be ineffective within the plan period.

Overall

20. I conclude that this site is a logical and desirable option for housing development. It will assist significantly in the creation of a generous and effective housing land supply that is consistent with the adopted strategic development plan. It is relatively constraint-free and has been thoroughly assessed prior to its inclusion in the proposed plan. Despite its local unpopularity, the grounds for retaining this housing allocation are in my opinion overwhelming.

Reporter's recommendations:
No modifications

Appendix 1: Body or person(s) submitting a representation raising the issue (including reference number):	
<u>STANDARD LETTER</u>	
Mr Brian Howat [197]	Joe Proctor [1058]
Mr Roger Riach [199]	Karen Omalley [1059]
Mr John Bent [208]	Donna Matthews [1060]
Mrs Claire Howat [222]	Robert McCabe [1061]
Mrs Linda Coughlan [228]	Charles Boyle [1062]
Mr. Christopher Gresham [229]	Paul Matthews [1063]
Mr James Thomson [230]	Hamish MacKintosh [1064]
Mrs Ellen Thomson [231]	Rosslyn Proctor [1065]
Mr. Robert Craig [233]	Callum Matthews [1066]
Mrs Catherine Craig [234]	Jennifer Heaney [1067]
Mrs Caroline McLean [238]	Jerald Heaney [1068]
Mr George Armstrong [244]	Mr Thomas Gatherer [1069]
Julie Crawford [245]	Lisa McColl [1070]
John Crawford [246]	Ms Janey Mackintosh [1071]
Mr Ewan McNaught [247]	Dawn McKellar [1072]
Dr Michael Tang [248]	M Finnigen [1073]
Mrs Po-Yu Tang [249]	Scot Woodburn [1074]
Miss Cass Tang [250]	Maggie Sheridan [1075]
Ms Louis Tang [251]	Elizabeth Sheridan [1076]
Miss Ella Tang [253]	Caroline McCabe [1077]
Mrs Fong Kiu Tang [254]	Alistair Stewart [1078]
Mr Hei-Sau Tang [255]	Emma Stewart [1079]
Mr Derek Tang [256]	Jerry Fallon [1080]
Sarah Riach [258]	Craig Matthews [1081]
Fiona McNaught [259]	Ms Sharon Meiklejohn [1082]
Adam Howat [260]	Thomas McColl [1083]
Iain King [262]	Mick Hydes [1084]
Janet King [263]	David Fraser [1086]
Abigail King [264]	Clare O'Neill [1087]
Emily King [265]	Marion Fraser [1088]
Rachel Holmes [267]	Ms Carol Farnocchi [1089]
John Holmes [268]	Michael Haughie [1090]
Catherine King [269]	Carolyn Brown [1091]
John King [271]	Sarah Kidd [1092]
James Walker [272]	Sharon Boyle [1093]
Shona Walker [273]	Agnes Lacy [1094]
Kevin Conneely [274]	John Lacy [1095]
Allison Conneely [275]	A. Baker [1096]
	Raymond Fallon [1097]
	Michelle Fallon [1098]

Laura Conneely [276]	Anne Don [1100]
Mr Gerard Kelly [277]	Connie Hydes [1102]
Mr William Crozier [279]	Ms Elaine Proctor [1103]
Mrs Ann Marie Crozier [280]	Scott Mitchell [1104]
Mrs Lorraine Barrow [292]	M Malcher [1105]
Mr Lee Barrow [293]	P. Mkangama [1107]
Mrs Simona Chichiarelli [294]	Ms Nicole Mitchell [1108]
Mr David Dunn [295]	James Patterson [1109]
Miss Giulia Dunn [296]	Caroline O'Neill [1110]
Mr Paul Everett [297]	Ms Karen Mitchell [1111]
master Ross Dunn [298]	John O'Neill [1112]
Sharon McCormack [299]	Stuart Scott [1114]
Kenneth Dick [300]	Agnes Storie [1115]
Andrew McCormack [301]	Carol Deeley [1116]
Caroline Anderson [302]	D Crawford [1117]
Alexander Anderson [303]	S Crawford [1118]
Suzanne Madden [304]	R Cunningham [1119]
Patrick Madden [305]	J Cunningham [1120]
James Madden [306]	Martin O'Neill [1121]
Kenny Love [307]	Doreen Allan [1122]
Miss Neve Barrow [308]	Gordon Allan [1123]
Miss Amy Motherwell [310]	Sheena Gatherer [1124]
Mrs Linda Motherwell [313]	Elizabeth Edgar [1125]
Mr David Motherwell [314]	Kevin Mitchell [1126]
Beverley Love [315]	J and W Brown [1127]
Daniel Love [316]	Jean Adams [1128]
Holly Love [317]	Mrs A Mason [1129]
Amanda Stobo [318]	Fraser Thomson [1130]
Alan Stobo [319]	Claire Thomson [1131]
Emma Stobo [320]	Marline Santos Thomson [1132]
Katie Stobo [321]	George Brand [1133]
Maureen Hibbens [322]	Gillian Stevenson [1134]
Alan Hibbens [323]	Marjory Perrit [1135]
Mark Hibbens [324]	Liz Williamson [1136]
Ross Hibbens [325]	Yvonne Dunlop [1137]
Mr Ian Moran [331]	Agnes Shedden [1138]
Olivia Barrow [332]	Neil Haines [1139]
Andrew Marshall [333]	Mr and Mrs W.B. Whitelock [1140]
Carol Marshall [334]	James Brophy [1141]
Lynn Marshall [335]	Belinda Scott [1142]
Susanne Marshall [336]	Mr and Mrs J Duncan [1143]
Miss Suzanne Martin [347]	A Easton [1144]
Dorothy Taylor [348]	E. Mitchell [1145]
Robert Taylor [349]	Linda and Hugh Thomson [1146]
Jack Taylor [350]	Joyce Parsons [1147]
Kevin Bryden [351]	Mrs J Webster [1148]
Elaine Bryden [352]	John Daly [1149]
Louise Bryden [355]	Lorraine Howard [1150]
Christine Barrett [356]	Mrs C McInnes [1151]
Robert Longmuir [357]	Alastair Fletcher [1152]
Kiera Longmuir [359]	Seven Parsons [1153]
Karla Cagney [360]	Ms Rhona Howie [1154]

Andrew Jackson [361]	Ms Jenna Howie [1155]
Nicola Jackson [362]	Iain Waddell [1156]
Luke Jackson [363]	Mr Brian Howie [1157]
Josh Jackson [364]	Myra Fletcher [1158]
Kerr Jackson [365]	Debbie Graham [1159]
John Jack [366]	John Berry [1160]
Sheena Jack [367]	Anthony Barlowe [1161]
Gillian Taylor [368]	Mr Stuart Howie [1162]
Stuart Taylor [369]	Christine Berry [1163]
Tracey MacCormack [371]	Mrs Chalk [1164]
Mark MacCormack [372]	Michelle Flannigan [1165]
Olivia MacCormack [373]	Anne Sloan [1166]
Markus MacCormack [374]	Mrs Mary Macfarlane [1167]
Jill Fogarty [375]	Mrs D Millar [1168]
Alan Gorry [376]	Mrs J Donohoe [1169]
Ronald McKenzie [393]	Vivian McGuigan [1170]
Mrs Carol Wilkie [397]	John Campbell [1171]
Mr Raymond Connolly [398]	Craig Taylor [1172]
Mrs Angela Kaplan [399]	Gordon Black [1173]
Louise McLaughlin [402]	Ian Montgomery [1174]
Barry McLaughlin [403]	Mr Norrie Feeney [1175]
Aidan McLaughlin [404]	Gemma Taylor [1176]
Abby McLaughlin [406]	Kevin McGuigan [1178]
Andrew Bliss [411]	Mr Derek Parker [1179]
Tegan Bliss [412]	Mr George Ward [1180]
Alexsis Cooper [413]	David McGuigan [1181]
Rod Cooper [414]	Ms Elizabeth Healy [1182]
Kirsty McGuire [415]	Ms Janet Drennan [1183]
Jean Craine [417]	Kenny Quinn [1184]
Oliver Craine [418]	James McGhee [1185]
James Herbison [419]	Ms Margaret Allen [1186]
Mandi Herbison [420]	Moir Newlands [1187]
Scott Herbison [422]	Gail Quinn [1188]
Callum Herbison [423]	Michael Bowman [1189]
Brian Wright [424]	Kenneth Moore [1190]
Audrey Wright [425]	Helen Walker [1191]
Ben Wright [427]	Angela McBride [1192]
Mr George Gibson [430]	Brenda Quinn [1193]
Mrs Jennifer Dougall [431]	Robert Coyle [1194]
Ann McKenzie [432]	Mr Brian Quinn [1195]
Miss Emma Crawford [440]	J Marshall [1196]
Gillian Connolly [441]	S Strang [1197]
Mrs Pamela Newlands [460]	Carol Goldthorp [1198]
John Hayes [461]	Jackie Feeney [1201]
Linda Coyle [463]	Joe Drennan [1202]
Mark Gilmour [464]	Douglas Goldthorp [1203]
Scott Gilmour [465]	C Henderson [1204]
Suzanne Gilmour [466]	A Webster [1205]
Holly Gilmour [467]	A Duffy [1206]
Suzy Everett [468]	A Wetherspoon [1207]
Kristins Everett [470]	E McDonald [1208]
Mr Thomas Newlands [471]	Ian and Fiona Watters [1720]

<p>Jonah Newlands [472] Michael Newlands [474] Lesley Woodhouse [481] Colin Woodhouse [482] Callum Woodhouse [484] Rory Woodhouse [485] Harry Duff [1053] Dr. Max Nanjiani [1054] Enid Nanjiani [1055] K Mkangama [1056] Mrs Davina Patterson [1057]</p>	<p>Mrs. Avril Gresham [1721] Mr. D Walker [1722] Miss Helen Crawford [1826] Mrs Margaret Crawford [1827] Mr Peter Crawford [1828]</p>
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Issue 21	Midton Road, Howwood	
Development plan reference:	Policy P3 – Additional Housing Site Schedule 2 – Additional Housing Sites – Greenfield	Reporter: Philip Hutchinson
Body or person(s) submitting a representation raising the issue (including reference number):		
John Cairney (212) Mactaggart and Mickel (1801)		
Provision of the development plan to which the issue relates:	Released for housing under Policy P3 with indicative capacity for the site set out in Schedule 2	
Planning authority's summary of the representation(s):		
<p><u>John Cairney (212)</u></p> <p>This field is littered with sinkholes from the mining.</p> <p>Is concerned that when work starts in this field it might undermine or destabilize the integrity of the foundations of surrounding residential properties.</p> <p>A development here will greatly diminish the rural/country atmosphere of this lovely quiet part of Howwood.</p> <p>There will be an increase in cars, more noise, pollution, risk of accidents for the school children from Howwood Primary or those who use the football park and play park on Midton Road.</p> <p>There is also concerns regarding flooding.</p> <p><u>Mactaggart and Mickel (1801)</u></p> <p>Support the proposed allocation of the site at Midton Road.</p> <p>The site is an effective site suitable for residential development. That can be brought forward for development during the plan period for between 30-50 units.</p> <p>The site offers an opportunity to help establish sustainable growth of the settlement.</p> <p>Housing sites in Howwood are sustainable as they are well connected by road and have good public transport links.</p> <p>There are opportunities for linkages to the Green Network.</p> <p>It is considered that Howwood would benefit from the development of new residential to help assist in sustaining the local services which currently serve the area.</p>		

Modifications sought by those submitting representations:
No modifications suggested.
Summary of responses (including reasons) by planning authority:
<p><u>John Cairney (212)</u></p> <p>Initial investigation work has been carried out on the site by the developer which has demonstrated that the site is effective and deliverable and can be brought forward within the required time frame. In addition, matters such as flooding, ground stability and access were considered to a degree. The developer is confident that the site can be developed without any major remedial work.</p> <p>The site is nestled within the village envelope, on the north eastern side of the settlement, surrounded by residential to the north and south and the village play park to the west. The site's eastern boundary stops short of the settlement built up edge. As it then meets the open grazing fields which separates Howwood from Johnstone. The location of this site within the existing built form of the village is in accordance with Scottish Planning Policy Paragraphs 159 (CD/03) which requires green belts to direct growth to the most appropriate locations.</p> <p>This site would form a logical and cohesive infill development, not impacting on the clear, defined and defensible green boundary to the east. A land use considerations planning sustainability assessment (CD/06), strategic environmental assessment (CD/07) and a landscape assessment (CD/08) were undertaken and this site emerged as a suitable location to deliver the required growth as required by Glasgow and Clyde Valley Strategic Development Plan (CD/02).</p> <p>This site emerged as a desirable option due to the relatively few planning and environmental constraints. In terms of effectiveness and deliverability, the developer has confirmed that the site meets the test of the Planning Advice Note (PAN) 2/2010 Housing Land Audit (CD/42) and potential technical constraints in terms of site stability, flooding, drainage and access can be resolved.</p> <p>The scale of the development that is proposed would not have a significant negative impact in terms of an increase in traffic, pollution and noise in Howwood. As the site is on the edge of the settlement there is good access to public transport.</p>
Reporter's conclusions:
<p>1. This site is well-located from a sustainability point of view, being well served by public transport and occupying a natural infill situation. It lies at - but within - the north eastern edge of the village. It has two storey houses across Midton Road to the southeast as well as to the northwest, at a lower level fronting the B787.</p> <p>2. The site has a football pitch and play area to the southwest (beyond a narrow treed strip). A deeper shelter-belt of trees separates the site from open countryside to the north east. This belt promises to make a very strong and easily defensible green belt boundary. It meets the B787 at the limit of frontage development on the near side. It meets Midton Road just within the limit of development opposite - at Kilknowe Cottages. Therefore, as a natural infill development opportunity this site is readily distinguished from</p>

others at Howwood which have been under consideration. This site is by far the front runner.

3. There is no evidence that the site would be ineffective, or even require exceptional remediation in advance of development. The implication that ground conditions (arising from former mining activity) might preclude development is hard to reconcile with long-standing housing development which lies directly to either side of the site. Moreover the potential developer has conducted initial site investigation work, finding that the site can be developed within the required timescale. In the light of this plus the assessments referred to above I conclude that this site is substantially constraint-free and that its development would be acceptable from a landscape point of view.

4. The scale of development which is proposed (30-50 units) is commensurate with the scale of this village. It is effective. Having regard to the wider land supply situation - from Issue 17 - this site cannot reasonably be dropped from the plan. Additionally, the redevelopment of the former bleach works site could happen as soon as market conditions call for it (see Issue 30). The development of this provisionally allocated site (ref; 5054-1) would not involve significant negative environmental impacts despite its elevated position on a north-west facing slope.

Reporter's recommendations:

No modifications

Issue 22	Allocated Site: Shillingworth, Bridge Of Weir	
Development plan reference:	Policy P3 – Additional Housing Sites, Schedule 2	Reporter: Ron Jackson
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Standard Letter: See Appendix 1 attached.</p> <p>OTHER REPRESENTATIONS</p> <p>Ranfurly Castle Golf Club (16)</p> <p>Andrew Forrest Properties (85)</p> <p>Mr James Macaulay (107)</p> <p>Old Course Ranfurly Golf Club (146)</p> <p>Persimmon Homes (west) Scotland (186)</p> <p>Mr Graham Hanley (198)</p> <p>Mrs Theresa Olivant (200)</p> <p>Arthur and Fiona Logan (211)</p> <p>Mr Ian McNab (214)</p> <p>Mr David Sweeney (215)</p> <p>Mr Michael Hopcroft (344)</p> <p>Mr Douglas McNicol (400)</p> <p>Mrs Lynsey Sweeney (401)</p> <p>Mrs Elaine Macleod (444)</p> <p>Mr Nigel Hedley (453)</p> <p>Mrs Jennifer Crawford (489)</p> <p>Alan Nicolson (501)</p> <p>Mr Walter Reid (502)</p> <p>Carol Mackay (505)</p> <p>Dr Tracey Hanley (506)</p> <p>Christina Campbell (513)</p> <p>E Stevenson (596)</p> <p>Mrs Sheena White (729)</p> <p>Miss Catherine Noble (819)</p> <p>Gordon Keir (1836)</p> <p>Mike Pepper (1844)</p> <p>Mr Richard Ferguson (1851)</p> <p>Mr Robert Robertson (1853)</p> <p>Mr Ross McMath (1856)</p> <p>Christine Clark (1863)</p> <p>James Clark (1867)</p> <p>Richard Fleming (1898)</p> <p>Lorraine Fleming (1900)</p> <p>James Geddes (1902)</p> <p>Neil Arthur (1903)</p> <p>Mr R. Stanley Chalmers (1905)</p> <p>Daphne Broomfield (1906)</p>	<p>Morven Mcleod (1921)</p> <p>Bridge of Weir Tennants & Residents Association (1923)</p> <p>Mrs Linda Begg (1931)</p> <p>Robert Adam (1937)</p> <p>Paula Adam (1939)</p> <p>Ranfurly Estate (1980)</p> <p>Mr Jim Marshall (1982)</p> <p>Ms Janet Reid (1983)</p> <p>MS IA McCallum (1984)</p> <p>Dorothy Motherwell (1985)</p> <p>Mr Iain Mackay (1986)</p> <p>Mr Hugh Meighan (1987)</p> <p>T. Russell (1988)</p> <p>Ms Helena Maclaren (1989)</p> <p>Ms Gillian Graveson (1990)</p> <p>Mr George Huey (1991)</p> <p>Dr Liz Smith (1992)</p> <p>Mr Don Polwarth (1993)</p> <p>Ms Deborah Morrison (1994)</p> <p>Mr David Mills (1995)</p> <p>Mr David Lang (1997)</p> <p>Councillor James W.H. MacLaren (1998)</p> <p>Paterson Partners (2003)</p> <p>R J Forgie (2008)</p> <p>JM McGill (2009)</p> <p>Mr Matt Lawrence (2010)</p> <p>Mr Rob Golbourn (2011)</p> <p>Councillor Mike Holmes (2013)</p> <p>SLG Technology Limited (2014)</p> <p>NCT Leather Limited (2017)</p> <p>Bridge of Weir Leather Company Limited (2023)</p> <p>Scottish Leather Group (2025)</p> <p>Margaret Jack (2027)</p> <p>Michael Carroll (2028)</p> <p>Lisa Milner-Smith (2029)</p> <p>Derek Mackay (2032)</p> <p>Karen Gilchrist (2042)</p> <p>Karen Carruth (2047)</p> <p>Paisley and Gryffe Transport Forum (2060)</p> <p>Bridge of Weir Community Council (2065)</p>	

Mr John Tuck (1908) Ms. Kathleen Tuck (1912) Ms. Jane Stirling (1914) Thomas McNish (1915) Mary Mungin (1916) Daniel Mungin (1918) Gordon Ritchie (1920)	Aleftav (2072)
Provision of the development plan to which the issue relates:	Released for housing under Policy P3 with indicative capacity for the site set out in Schedule 2
Planning authority's summary of the representation(s):	
<p>Object to the allocation of housing land at Shillingworth</p> <p><u>Andrew Forrest Properties (85), Mr James Macaulay (107), Mr Graham Hanley (198), Mrs Theresa Olivant (200), Arthur and Fiona Logan (211), Mr Ian McNab (214), Mr David Sweeney (215), Mr Michael Hopcroft (344), Mr Douglas McNicol (400), Mrs Lynsey Sweeney (401), Mrs Elaine Macleod (444), Mr Nigel Hedley (453), Mrs Jennifer Crawford (489), Alan Nicolson (501), Mr Walter Reid (502), Carol Mackay (505), Dr Tracey Hanley (506), Christina Campbell (513), E Stevenson (596), Gordon Keir (1836), Mike Pepper (1844), Mr Richard Ferguson (1851), Mr Robert Robertson (1853), Mr Ross McMath (1856), Christine Clark (1863), James Clark (1867), Richard Fleming (1898), Lorraine Fleming (1900), James Geddes (1902), Neil Arthur (1903), Mr R. Stanley Chalmers (1905), Daphne Broomfield (1906), Mr John Tuck (1908), Ms. Kathleen Tuck (1912), Ms. Jane Stirling (1914), Thomas McNish (1915), Mary Mungin (1916), Daniel Mungin (1918), Gordon Ritchie (1920), Morven Mcleod (1921), Bridge of Weir Tennants & Residents Association (1923), Mrs Linda Begg (1931), Robert Adam (1937), Paula Adam (1939), Mr Jim Marshall (1982), Ms Janet Reid (1983), MS IA McCallum (1984), Dorothy Motherwell (1985), Mr Iain Mackay (1986), Mr Hugh Meighan (1987), T. Russell (1988), Ms Helena Maclaren (1989), Ms Gillian Graveson (1990), Mr George Huey (1991), Dr Liz Smith (1992), Mr Don Polwarth (1993), Ms Deborah Morrison (1994), Mr David Mills (1995), Mr David Lang (1997), Councillor James W.H. MacLaren (1998), Paterson Partners (2003), R J Forgie (2008), JM McGill (2009), Mr Matt Lawrence (2010), Mr Rob Golbourn (2011), Councillor Mike Holmes (2013), SLG Technology Limited (2014), NCT Leather Limited (2017), Bridge of Weir Leather Company Limited (2023), Scottish Leather Group (2025), Margaret Jack (2027), Michael Carroll (2028), Lisa Milner-Smith (2029), Derek Mackay (2032), Karen Gilchrist (2042), Karen Carruth (2047), Paisley and Gryffe Transport Forum (2060), Bridge of Weir Community Council (2065)</u></p> <p><u>Standard Letter (173, 237, 499, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770,</u></p>	

771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1041, 1042, 1043, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1748, 1750, 1751, 1752, 1753, 1754, 1755, 1757, 1758, 1759, 1761, 1765, 1767, 1770, 1771, 1772, 1774, 1777, 2118).

Object to the development of land at Shillingworth.

Support for allocation of housing land at Shillingworth

Persimmon Homes (west) Scotland (186)

Support the development of land at Shillingworth. Agree with the rationale for release of site in terms of location and the ability to meet a range and choice of housing in the area. However the precise western boundary should be determined at the planning application stage. The most logical, suitable urban edge which is robust can be found through masterplanning of the site, ensuring the boundary created would be for the longer term. The site is effective, deliverable and represents a best fit in terms of landscape and visual aspects. The scale of the site is modest and measured to integrate with the community. The site has limited vegetation or flora, therefore, limited biodiversity interest. The condition of the field varies and in parts has the appearance of vacant ground. The urban edge is arbitrary given the range of boundary treatment and does not justify its definition as greenbelt. The site can be easily accessed and will not place a drain on local facilities, indeed it will support them. A quality environment can be created, providing a clearer, more definable greenbelt edge. No environmental designations will be put at risk.

Ranfurly Estate (1980)

Support allocation of land at Shillingworth as an additional housing site in the green belt. This is an effective and deliverable site which meets the tests set out within PAN 2/2010 (CD/42). The site would actively assist in achieving the necessary housing numbers for Bridge of Weir and Renfrewshire as a whole. This site though could support more than the indicative capacity of 40 units. The planning authority should consider widening the land area allocation which would increase the housing numbers on the site which would still allow for a significant landscape buffer, fitting well into the existing environment, protecting and enhancing the settlement boundary. The site is more immediately marketable than others within Renfrewshire.

Landscape

Mr James Macaulay (107), Mr Graham Hanley (198), Mr David Sweeney (215), Mr Douglas McNicol (400), Mrs Lynsey Sweeney (401), Mrs Elaine Macleod (444) Mr Nigel Hedley (453), Mr Walter Reid (502), Dr Tracey Hanley (506), Gordon Keir (1836), Mike pepper (1844), Mr Richard Ferguson (1851), Mr Ross McMath (1856), Richard Fleming (1898), Lorraine Fleming (1900), James Geddes (1902) Neil Arthur (1903), Mr R. Stanley Chalmers (1905), Daphne Broomfield (1906), Ms. Kathleen Tuck (1912), Ms. Jane Stirling (1914), Mary Mungin (1916), Morven Mcleod (1921), Bridge of Weir Tennants & Residents Association (1923), Mrs Linda Begg (1931), Mr Jim Marshall (1982), Ms Helena Maclaren (1989), Dr Liz Smith (1992), Ms Deborah Morrison (1994), Mr David Mills (1995), Councillor James W.H. MacLaren (1998), Paterson Partners (2003), R J Forgie (2008), Mr Matt Lawrence (2010), Mr Rob Golbourn (2011)

Standard Letter (173, 237, 499, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1041, 1042, 1043, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1748, 1750, 1751, 1752, 1753, 1754, 1755, 1757, 1758, 1759, 1761, 1765, 1767, 1770, 1771, 1772, 1774, 1777, 2118).

Disagree with the Council's current view that this site does not have significant presence in the landscape and that the impact on the landscape character of any development would be minimal. The conclusions of the Scottish Government Reporter into the Public Local Inquiry in 2004 (CD/16) found that the landscape setting made the site unsuitable for development and concluded that even with the exercise of considerable care in the siting, design and layout of houses, development would have a considerable impact upon

the landscape setting of this part of Bridge of Weir and for that reason alone the site should remain in the green belt. The Council also opposed development due to it constituting a major intrusion in the green belt with the primary considerations regarding the impact upon the landscape setting of the settlement. Given that the site, its surroundings and the land use remain unchanged then the conclusions from the 2004 PLI (CD/16) remain valid. It is difficult to understand why the Council's view has changed and contradicts the independent advice of the Scottish Government Reporter. It can only be concluded that the assessors have failed to carry out a fair, comprehensive and robust assessment. It is essential this matter should be the subject of a further independent examination.

Mr James Macaulay (107), Old Course Ranfurly Golf Club (146), Mr Graham Hanley (198), Mr Ian McNab (214), Mr David Sweeney (215), Mrs Elaine Macleod (444), Mr Nigel Hedley (453), Mrs Jennifer Crawford (489), Alan Nicolson (501), Mr Walter Reid (502), Dr Tracey Hanley (506), Christina Campbell (513), Gordon Keir (1836), Mike pepper (1844), Mr Ross McMath (1856), Christine Clark (1863), James Clark (1867), Richard Fleming (1898), Lorraine Fleming (1900), Mr R. Stanley Chalmers (1905), Mary Mungin (1916), Daniel Mungin (1918), Morven Mcleod (1921), Bridge of Weir Tennants & Residents Association (1923), Mrs Linda Begg (1931), Robert Adam (1937), Paula Adam (1939), Ms Janet Reid (1983), Dorothy Motherwell (1985), Mr Hugh Meighan (1987), Ms Gillian Graveson (1990), Councillor James W.H. MacLaren (1998), Paterson Partners (2003), Mr Rob Golbourn (2011), SLG Technology Limited (2014), NCT Leather Limited (2017), Bridge of Weir Leather Company Limited (2023), Scottish Leather Group (2025), Michael Carroll (2028), Derek Mackay (2032)

Development would be highly detrimental to the special, attractive appearance, character and landscape setting of this side of Bridge of Weir. This is a very prominent green wedge, a very visible site, largely open in character and development will have a severely adverse impact on local landscape, with a loss of visual amenity. The site is an attractive piece of land which has outstanding views out to the surrounding countryside. Development will have significant impact on the Bridge of Weir skyline.

Agricultural use

Mr James Macaulay (107), Mr Graham Hanley (198), Mr David Sweeney (215), Mrs Lynsey Sweeney (401), Mrs Jennifer Crawford (489), Alan Nicolson (501), Mr Walter Reid (502), Dr Tracey Hanley (506), Christina Campbell (513), E. Stevenson (596), Gordon Keir (1836), Mike pepper (1844), Mr Ross McMath (1856), Christine Clark (1863), James Clark (1867), Richard Fleming (1898), Lorraine Fleming (1900), Mr R. Stanley Chalmers, Neil Arthur (1903), Daphne Broomfield (1906), Mr John Tuck (1908), Ms. Kathleen Tuck (1912), Ms. Jane Stirling (1914) Mary Mungin (1916), Morven Mcleod (1921), Bridge of Weir Tennants & Residents Association (1923), Mrs Linda Begg (1931), Robert Adam (1937), Paula Adam (1939), Ms Janet Reid (1983), Mr Hugh Meighan (1987), Ms Helena MacLaren (1989) Ms Gillian Graveson (1990), Mr George Huey (1991), Mr David Lang (1997), Councillor James W.H. MacLaren (1998), R J Forgie (2008), JM McGill (2009), Mr Rob Golbourn (2011), Councillor Mike Holmes (2013), Margaret Jack (2027), Derek Mackay (2032)

Standard Letter (173, 237, 499, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649,

650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1041, 1042, 1043, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1748, 1750, 1751, 1752, 1753, 1754, 1755, 1757, 1758, 1759, 1761, 1765, 1767, 1770, 1771, 1772, 1774, 1777, 2118).

The site is viable agricultural land and should not be a priority for development. The field is good quality grazing pasture supporting a herd of prime beef cattle. Development will sever access to the surrounding fields preventing grazing, making them redundant.

Recreational use

Mr James Macaulay (107), Mr Graham Hanley (198), Arthur and Fiona Logan (211), Mr David Sweeney (215), Mrs Lynsey Sweeney (401), Mr Nigel Hedley (453), Mr Walter Reid (502), Christina Campbell (513), Mike Pepper (1844), Mr Ross McMath (1856), Richard Fleming (1898), Thomas McNish (1915), Bridge of Weir Tennants & Residents Association (1923), Ms Helena MacLaren (1989), Ms Deborah Morrison (1994), Mr David Lang (1997), Councillor James W.H. MacLaren (1998), JM McGill (2009)

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788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1041, 1042, 1043, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1748, 1750, 1751, 1752, 1753, 1754, 1755, 1757, 1758, 1759, 1761, 1765, 1767, 1770, 1771, 1772, 1774, 1777, 2118).

This site is an important part of the community forming an integral green space. The site is extensively used for recreational use, exercising pets and this asset would be lost. Development would also impact on views and therefore the areas desirability to recreational users.

Green belt / Countryside

Mr James Macaulay (107), Mr Graham Hanley (198), Arthur and Fiona Logan (211), Ian Mcnab (214), Mr David Sweeney (215), Mr Douglas McNicol (400), Mrs Lynsey Sweeney (401), Mrs Elaine Macleod (444), Mr Nigel Hedley (453), Mr Walter Reid (502), Carol Mackay (505), Dr Tracey Hanley (506), Christina Campbell (513), Gordon Keir (1836), Mike pepper (1844), Christine Clark (1863), James Clark (1867), Richard Fleming (1898), Lorraine Fleming (1900), Mrs Linda Begg (1931), Ms Janet Reid (1983), Dorothy Motherwell (1985), Mr Iain Mackay (1986), Ms Helena MacLaren (1989), Dr Liz Smith (1992), Ms Deborah Morrison (1994), Councillor James W.H. MacLaren (1998), R J Forgie (2008), JM McGill (2009), Mr Rob Golbourn (2011), Councillor Mike Holmes (2013), SLG Technology Limited (2014), NCT Leather Limited (2017), Bridge of Weir Leather Company Limited (2023), Scottish Leather Group (2025), Michael Carroll (2028)

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822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1041, 1042, 1043, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1748, 1750, 1751, 1752, 1753, 1754, 1755, 1757, 1758, 1759, 1761, 1765, 1767, 1770, 1771, 1772, 1774, 1777, 2118).

Biggest encroachment into the green belt in Bridge of Weir for over 20 years and will lead to further green belt development. There is little containment between this site and surrounding green belt land, providing a defensible settlement edge would be greatly affected by any development.

Paterson Partners (2003), JM McGill (2009)

In terms of the Glasgow and the Clyde Valley Strategic Development Plan (CD/02), sequential 'hierarchy' for choosing development sites, then brownfield should be first choice followed brownfield in the greenbelt and lastly greenfield in the greenbelt. Whitelint Gate should be considered before Shillingworth if the LDP is to accord with the SDP hierarchy.

Biodiversity/ Flora / Fauna

Mr James Macaulay (107), Arthur and Fiona Logan (211), Ian McNab (214), Mr Nigel Hedley (453), Mrs Jennifer Crawford (489), Alan Nicolson (501), Carol Mackay (505), Christina Campbell (513), E Stevenson (596), Mary Mungin (1916), Morven Mcleod (1921), Dorothy Motherwell (1985), Mr Iain Mackay (1986), Mr Hugh Meighan (1987), Mr David Lang (1997) Councillor James W.H. MacLaren (1998), SLG Technology Limited (2014), NCT Leather Limited (2017), Bridge of Weir Leather Company Limited (2023), Scottish Leather Group (2025).

The site supports a diverse range of wildlife, habitats and biodiversity, this will be altered or lost through development. It is the greenspace wildlife amenity for the local community.

Traffic / Access

Mr Graham Hanley (198), Arthur and Fiona Logan (211), Ian McNab (214), Mr David Sweeney (215), Mr Douglas McNicol (400), Mrs Lynsey Sweeney (401), Mrs Elaine Macleod (444), Mr Nigel Hedley (453), Mrs Jennifer Crawford (489), Alan Nicolson (501), Mr Walter Reid (502), Carol Mackay (505), Christina Campbell (513), E Stevenson (596), Mrs Sheena White (729), Mike Pepper (1844), Mr Richard Ferguson (1851), Mr Robert Robertson (1853), Mr Ross McMath (1856), Christine Clark (1863), Richard Fleming (1898), Lorraine Fleming (1900), Neil Arthur (1903), Mr R. Stanley Chalmers (1905),

Daphne Broomfield (1906), Mr John Tuck (1908), Ms. Kathleen Tuck (1912), Thomas McNish (1915), Mary Mungin (1916), Gordon Ritchie (1920), Morven Mcleod (1921), Bridge of Weir Tennants & Residents Association (1923), Robert Adam (1937), Paula Adam (1939), Mr Jim Marshall (1982), Ms Janet Reid (1983), MS IA McCallum (1984), Dorothy Motherwell (1985), Mr Iain Mackay (1986), T. Russell (1988), Ms Helena MacLaren (1989), Ms Gillian Graveson (1990), Mr George Huey (1991), Dr Liz Smith (1992), Mr Don Polwarth (1993), Mr David Mills (1995), Mr David Lang (1997), Councillor James W.H. MacLaren (1998), Paterson Partners (2003), R J Forgie (2008), JM McGill (2009), Mr Rob Golbourn (2011), Councillor Mike Holmes (2013), SLG Technology Limited (2014), NCT Leather Limited (2017), Bridge of Weir Leather Company Limited (2023), Scottish Leather Group (2025), Margaret Jack (2027), Michael Carroll (2028), Paisley and Gryffe Transport Forum (2060)

Standard Letter (173, 237, 499, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1041, 1042, 1043, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1748, 1750, 1751, 1752, 1753, 1754, 1755, 1757, 1758, 1759, 1761, 1765, 1767, 1770, 1771, 1772, 1774, 1777, 2118).

Concern regarding pedestrian and road safety caused by increased traffic and construction traffic. Development will lead to increased car use as new households will be largely dependent on the car given existing public transport provision which will therefore impact on air quality, safety, parking and the condition of the roads.

Ms Gillian Graveson (1990)

Support access opportunities to open space, however access is often hampered by the

lack of footways.

Paisley and Gryffe Transport Forum (2060)

As part of any planning approvals, Kilgraston Road should be made up to a suitable standard, by resurfacing and creation of a two-way carriageway which would allow the area to be served with public transport.

Aleftav (2072)

Access to the site is constrained by the ransom strip at the end of the cul de sac at Shillingworth Place and Earl Place.

Infrastructure

Ian McNab (214), Mr David Sweeney (215), Mr Douglas McNicol (400), Mr Nigel Hedley (453), Mrs Jennifer Crawford (489), Mr Walter Reid (502), Carol Mackay (505), Christina Campbell (513), E Stevenson (596), Miss Catherine Noble (819), Mike Pepper (1844), Mr Richard Ferguson (1851), Mr Robert Robertson (1853), Mr Ross McMath (1856), Christine Clark (1863), James Clark (1867), Richard Fleming (1898), Neil Arthur (1903), Mr R. Stanley Chalmers (1905), Daphne Broomfield (1906), Ms. Kathleen Tuck (1912), Ms. Jane Stirling (1914), Gordon Ritchie (1920), Morven Mcleod (1921), Robert Adam (1937), Paula Adam (1939), Ms Janet Reid (1983), MS IA McCallum (1984), Mr Iain Mackay (1986), Mr George Huey (1991), Dr Liz Smith (1992), Ms Deborah Morrison (1994), Mr David Lang (1997), Councillor James W.H. MacLaren (1998), Paterson Partners (2003), JM McGill (2009), Mr Rob Golbourn (2011), Councillor Mike Holmes (2013), SLG Technology Limited (2014), NCT Leather Limited (2017), Bridge of Weir Leather Company Limited (2023), Scottish Leather Group (2025), Margaret Jack (2027), Michael Carroll (2028), Karen Carruth (2047) Paisley and Gryffe Transport Forum (2060)

Concerns raised regarding impact on local services and facilities, capacity of sewerage and drainage system with limited viable solutions to effectively drain the site and schools to accommodate development.

Ranfurly Castle Golf Club (16), Alan Nicolson (501), Mr Richard Ferguson (1851)

Not an effective site and would require significant investment. Too societally, financially and aesthetically expensive. This area is highly unsuited to any additional major developments turning it into a suburb with rural infrastructure supporting a suburban population.

Mr James Macaulay (107), Mary Mungin (1916), Councillor James W.H. MacLaren (1998)

There are no existing issues with surface water run-off or flooding, field is well drained.

Procedure

Councillor Mike Holmes (2013),

It is questionable why this site was not identified for greenfield release at Main Issues Report stage.

Mr Ross McMath (1856).

Suspicious that a u-turn has been made in terms of indentifying this site as being suitable for housing.

Lisa Milner-Smith (2029)

It would be easier to know how we feel about the proposed development if more detail was provided to local people about what will be there once built.

Mrs Linda Begg (1931)

A worrying fact is that our planners appear to be working with a specific group of developers, Persimmon Homes, tailoring housing development plans, with total disregard for previous findings and irrespective of any impact such development would have on green space and landscape.

Site boundary

Persimmon Homes (west) Scotland (186)

The boundary of the site would be best defined through a detailed planning application. The straight edge shown on the proposals map may not be the most effective edge based on topographical conditions.

General

Mr James Macaulay (107), Ian McNab (214), Mrs Elaine Macleod (444), Thomas McNish (1915)

The overall value of visual amenity and cultural significance is undervalued, development would be highly detrimental to amenity.

Mr James Macaulay (107), Mr Graham Hanley (198), Ian McNab (214), Mrs Elaine Macleod (444), Mr Walter Reid (502), Dr Tracey Hanley (506), Christina Campbell (513), Mary Mungin (1916), Bridge of Weir Tennants & Residents Association (1923), Mr David Lang (1997).

Development would create coalescence with Shillingworth Steading detracting from its aesthetic value.

Mrs Theresa Olivant (200), Mr Ian McNab (214), Mrs Elaine Macleod (444)
Mrs Jennifer Crawford (489), Alan Nicolson (501), Mr Ross McMath (1856), Mr R. Stanley Chalmers (1905), Ms. Kathleen Tuck (1912), Thomas McNish (1915), Mr David Mills (1995), Lisa Milner-Smith (2029)

The impact on residential amenity will ruin peaceful area and effect enjoyment of outdoor space.

Councillor James W.H. MacLaren (1998).

Existing properties will be severely overlooked and dwarfed by new properties.

Mrs Theresa Olivant (200)

Development will lower current house values.

Mr Nigel Hedley (453), Carol Mackay (505), Christina Campbell (513), Mr Ross McMath (1856), Mr R. Stanley Chalmers (1905), Mary Mungin (1916), Bridge of Weir Tennants & Residents Association (1923), Ms Janet Reid (1983), Dorothy Motherwell (1985), Mr Iain Mackay (1986), Karen Carruth (2047)

Economic issues have led to a lack of demand or a saturated housing market, with properties on the market for a while or are empty or derelict.

Mr Ian McNab (214),

Dispute that the cul de sac at Shillingworth Place and Earl Place were left for future development of the site.

Alan Nicolson (501),

Increased noise, light and gas pollution during construction and on completion of housing.

Christine Clark (1863), James Clark (1867)

Poor policing will create security risks and increased crime levels as has been seen in other similar developments within rural villages.

Development would have devastating effects on the local community.

Mrs Linda Begg (1931)

No matter what the housing requirements are by the year 2025, this site should never be considered again because its suitability for development has been so robustly tested.

Bridge of Weir Community Council (2065)

Green belt release is not justified particularly when there are possible brownfield sites capable of delivering 40 units within the existing village envelope.

Paterson Partners (2003)

The site is not sustainable, it is not suitable for greenfield / greenbelt release. There are other effective, brownfield sites in Bridge of Weir, such as Whitelint Gate which are more sustainable and should be released for housing before the Shillingworth site.

Paterson Partners (2003), Mr Rob Golbourn (2011)

There is a considerable area exposed to surface rock which will affect infrastructure costs.

SLG Technology Limited (2014), NCT Leather Limited (2017), Bridge of Weir Leather Company Limited (2023), Scottish Leather Group (2025)

Additional housing in the area might increase the risk of complaints regarding the operation of the Bridge of Weir Leather works which then may in turn adversely impact on any expansion plans for the works and resultant local employment opportunities which would be contrary to the spatial strategy of supporting sustainable economic growth.

Lisa Milner-Smith (2029)

Concerned about the number and type of houses which will be squeezed into the site.

Derek Mackay (2032)

Affect on the rural nature of the immediate area and would be a great loss for such a small number of potential plots.

Modifications sought by those submitting representations:

Mr James Macaulay (107), Mr Graham Hanley (198), Mrs Theresa Olivant (200), Arthur and Fiona Logan (211), Mr Ian McNab (214), Mr David Sweeney (215), Mr Michael Hopcroft (344), Mr Douglas McNicol (400), Mrs Lynsey Sweeney (401), Mrs Elaine Macleod (444), Mr Nigel Hedley (453), Mrs Jennifer Crawford (489), Alan Nicolson (501), Mr Walter Reid (502), Carol Mackay (505), Dr Tracey Hanley (506), Christina Campbell (513), E Stevenson (596), Gordon Keir (1836), Mike Pepper (1844), Mr Richard Ferguson (1851), Mr Robert Robertson (1853), Mr Ross McMath (1856), Christine Clark (1863), James Clark (1867), Richard Fleming (1898), Lorraine Fleming (1900), James Geddes (1902), Neil Arthur (1903), Mr R. Stanley Chalmers (1905), Daphne Broomfield (1906), Mr John Tuck (1908), Ms. Kathleen Tuck (1912), Ms. Jane Stirling (1914), Thomas McNish (1915), Mary Mungin (1916), Daniel Mungin (1918), Gordon Ritchie (1920), Morven Mcleod (1921), Bridge of Weir Tennants & Residents Association (1923), Mrs Linda Beqq (1931), Robert Adam (1937), Paula Adam (1939), Mr Jim Marshall (1982), Ms Janet Reid (1983), MS IA McCallum (1984), Dorothy Motherwell (1985), Mr Iain Mackay (1986), Mr Hugh Meighan (1987), T. Russell (1988), Ms Helena Maclaren (1989), Ms Gillian Graveson (1990), Mr George Huey (1991), Dr Liz Smith (1992), Mr Don Polwarth (1993), Ms Deborah Morrison (1994), Mr David Mills (1995), Mr David Lang (1997), Councillor James W.H. MacLaren (1998), Paterson Partners (2003), R J Forgie (2008), JM McGill (2009), Mr Matt Lawrence (2010), Mr Rob Golbourn (2011), Councillor Mike Holmes (2013), SLG Technology Limited (2014), NCT Leather Limited (2017), Bridge of Weir Leather Company Limited (2023), Scottish Leather Group (2025), Margaret Jack (2027), Michael Carroll (2028), Lisa Milner-Smith (2029), Derek Mackay (2032), Karen Gilchrist (2042), Karen Carruth (2047), Paisley and Gryffe Transport Forum (2060), Bridge of Weir Community Council (2065)

Standard Letter (173, 237, 499, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719,

720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1041, 1042, 1043, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1748, 1750, 1751, 1752, 1753, 1754, 1755, 1757, 1758, 1759, 1761, 1765, 1767, 1770, 1771, 1772, 1774, 1777, 2118).

Reverse decision in LDP, retain Shillingworth in green belt.

Ranfurly Castle Golf Club (16).

Site at Ranfurly Castle Golf Club, Clevans Road should be included within Schedule 1 or 2 in the LDP for an indicative capacity of 5 units.

Andrew Forrest Properties (85)

Include site south of Kilmalcolm Road and Strathgryffe Crescent as suitable for future housing development.

Old Course Ranfurly Golf Club (146)

Site at Lawmarnock Road should be released for development.

Persimmon Homes (west) Scotland (186)

The precise western boundary of the site to be determined through masterplanning at the application stage.

Ranfurly Estate (1980)

Extend the western boundary of the site to allow an increase in housing units.

Paterson Partners (2003)

Shillingworth should be deleted from Schedule 2 with the 40 house capacity re-diverted to

the Whiteint Gate brownfield site which should be included within Schedule 1 as a redevelopment opportunity.

Aleftav (2072)

Recommend omitting Shillingworth in favour of Kilmacolm Road site, or an allocation of both sites.

Summary of responses (including reasons) by planning authority:

Allocation of land for housing at Shillingworth

In accordance with Scottish Planning Policy (SPP) (CD/03) and Planning Advice Note (PAN) 2/2010 (CD/42), Renfrewshire's Local Development Plan requires to indicate a generous and effective supply of land for housing. The figures set out in the proposed Glasgow and the Clyde Valley Strategic Development Plan (CD/02) forecast in the Housing Need and Demand Assessment (CD/37) which were translated at a local level into the Housing Supply Targets set out in the draft Renfrewshire Local Housing Strategy 2011 – 2016 (CD/39) were taken to inform the Renfrewshire Local Development Plan Main Issues Report (CD/05). At the consultation stage of the Main Issues Report (MIR) (CD/08) in December 2011, it was indicated that additional land would require to be identified to provide a generous and effective housing land supply. Brownfield and green belt sites were identified to meet the overall housing land requirement set at that time, Shillingworth was not considered as being required to meet this requirement. However since the consultation on the MIR and the production of the proposed Renfrewshire Local Development Plan through 2012 there have been some changes, alterations and updates that required to be taken into account which has meant that more green belt land is required to be identified to meet Renfrewshire's housing land requirements. The following changes/updates required to be considered in the production of the proposed LDP:

- The 2012 Housing Land Audit (CD/38) indicated a decrease in effective land supply, as in the current economic climate some sites would no longer be considered effective and deliverable within 5 years of the plan. This was agreed through discussion with Homes For Scotland;
- A decrease in the number of sites in the housing land supply which were considered as being no longer able to become effective within the plan period;
- In line with the average outputs of housebuilders, the programming for many large sites was decreased to a maximum 25 units per annum per housebuilder which meant substantial reduction in programming for Bishopton and Johnstone South West Community Growth Areas as well as Renfrew North sites;
- The housing supply targets in the finalised Renfrewshire Local Housing Strategy (CD/39) had increased in line with the final indicative all-tenure housing requirement as set out in the adopted Glasgow and the Clyde Valley Strategic Development Plan (CD/02), therefore the housing land requirements in the LDP required to increase; and,
- Providing a generous supply of land for housing was indicated at anything up to 20% above the housing supply target, this required to be identified in the proposed LDP.

Therefore as set out on Page 27 of the proposed LDP, there was a need to address a shortfall in the supply of land for housing from the sites identified to the Council through the Suggestions for Land Use Change and the MIR submissions, the Shillingworth site was one of nine sites that was considered the most suitable locations for release for housing in terms of both planning and environmental considerations. The identification and provision of an effective and generous housing land supply is detailed further in Issue 17 and the identification of greenfield release sites is detailed in Issue 18.

Sites submitted for a change in land use allocation went through a fair, comprehensive and robust assessment process including a land use considerations planning sustainability assessment (CD/06), a strategic environmental assessment (CD/07), a landscape assessment (CD/08) and consultation on the Main Issues Report to assess the suitability of the site for development. The sites chosen for greenbelt release were identified to help deliver sustainable communities that are in places which offer a high quality of life with a wide range of existing assets. The suitability of the site is addressed further in response to the representations made with respect to the site.

Persimmon Homes (west) Scotland (186), Ranfurly Estate (1980)

Support for this allocation of land is noted.

Landscape

In relation to identifying the most suitable locations to deliver the housing land requirements in the LDP, this site emerged more favourable than other sites put forward for potential housing development in Bridge of Weir because it is considered that it has less of a significant presence and prominence in the landscape than the other sites suggested. The site is undulating, rising in the west and it is agreed that it is visible from certain surrounding vantage points. However the existing housing to the east is already visible in this landscape and it is the council's intention to ensure development follows the same built form, height and scale of the existing residential units. By only allowing development on the eastern part of the site, the lower, less prominent part of the site, along with ensuring that towards the western edge, where there is a prominent ridge, that there is sensitive landscaping along with the retention of the existing landscape features on this site, this would enable the residential development to be more readily accommodated within the landscape. Therefore developed in this form, the impact on the local landscape character would be lessened.

The council respects the conclusions of the Scottish Government Reporter in the 2004 Public Local Inquiry (CD/16). However in 2004 there was no need to identify additional housing sites. The housing land requirements identified in the Renfrewshire Local Plan met the identified need and demand at that time. This is not the case with the Proposed Renfrewshire Local Development Plan as identified above. There is a requirement to meet a potential shortfall which cannot be met by the established housing land supply and land in the green belt, across Renfrewshire requires to be allocated. The site at Shillingworth was identified as having the least impact on the local landscape which would not significantly change the landscape character or visual profile of the area. Other sites suggested for potential residential development in Bridge of Weir are assessed in Issue 26. The conclusion from assessment of all of these additional potential housing sites was that the site at Shillingworth had the least impact on the landscape setting or character, was not as prominent as other sites and therefore less of an effect on visual

amenity or the skyline. Any impact would be localised rather than having an overall impact on the village. As well as this it emerged as the only site that could integrate and relate well to the existing built form.

Agricultural use

The site is not prime agricultural land and therefore not excluded from development. Scottish Planning Policy (CD/03) considers that planning authorities should enable development in all rural areas which support prosperous and sustainable communities. SPP (para. 94) outlines that the requirement for development plans to allocate a generous supply of land to meet housing requirements applies equally to rural and urban areas and that plans should support more opportunities for small scale housing development. It is considered that development of this site will not prevent the surrounding fields from being actively farmed.

Recreational use

Given the current use of the site as well existing boundary treatment surrounding the site, it is not obvious how this site is considered as an integral green space, extensively used by the surrounding community for a recreational purpose. It may be an important piece of land within the surrounding community which forms an integral green space to those that look out onto the site. However the use of the sites at certain times of the year for grazing purposes would limit the type and range of recreational activities. There are no obvious signs that demonstrating that this site acts as an active area of open space, therefore this claim is disputed. The council considers that the development of the site would not have an adverse impact on views and the desirability of the area to recreational users, given that it wouldn't stop or prevent the existing recreational use of the surrounding area.

Green belt / Countryside

There has not been a requirement for the identification green belt release in a Renfrewshire development plan for a number of years. However as outlined above there is a requirement in this LDP. It has been a challenge to identify the right sites in the right locations to meet the housing land requirements. As indicated above numerous assessments have been undertaken and it is considered that this allocated site was the most logical site for development. This site has containment and development is unlikely to result in development spreading to surrounding fields.

As indicated in Issue 26, Whitelint Gate is considered to be brownfield but there were other factors which are outlined in the overall assessment of this site which indicate that Shillingworth is a more appropriate site for residential development to meet the overall housing land requirements.

Biodiversity / Flora / Fauna

As a requirement of developing green belt sites there will be a requirement to provide a detailed study of the existing biodiversity, flora and fauna at the site. The strategic environmental assessment (CD/07) undertaken as part of the site assessment did not raise any significant issues. In line with the policies within the proposed LDP and New Development SG (CD/09) there is a requirement to ensure protection, mitigation and enhancement of assets such as biodiversity and this will be dealt with at any detailed planning application stage.

Traffic / Access

Development of any site is likely to result in increased traffic movements. However the scale of this site is unlikely to have a significant impact on road and pedestrian safety. The developer would work with the council to ensure the most appropriate and safe access for construction traffic. Although it is recognised that evening and weekend public transport services are limited, as with all of Renfrewshire's villages, there is public transport available and therefore the development is able to be served by sustainable modes of transport. Again given the scale of development, the impact on air quality, safety, parking and the condition of the roads will be limited. The developer will be required to design in suitable access to connect into the existing residential area, to services and facilities as well as to open space.

With regard to the scale of the development, it will be a requirement of development to upgrade Kilgraston Road to adoptable standard. Suitable access and roads leading to and as part of the development will be required but this will not impact on Kilgraston Road.

Any concerns relating to the existence of ransom strips preventing access lie with the landowner / developer to resolve and is not a matter for the development plan process. Both the landowner and developer have confirmed that this is an effective development site capable of development within the plan period and accords with the PAN 2/2010 (CD/42) in that there is a solid commitment to removing any constraints to allow the site to contribute to the housing land requirements.

Infrastructure

Investment may be needed in water service infrastructure but Scottish Water have agreed that they will work with developers to deliver sites which may require developers to provide the necessary infrastructure or services, or a contribution towards its provision, in order to mitigate the impact of development. In line with proposed LDP policies and the New Development SG (CD/09), appropriate drainage and sewerage measures will be required to service the site.

Capacity exists within existing primary and secondary schools to accommodate the development.

The proposed LDP states that developers will require to make good any infrastructure deficits associated with any new development, in terms of required infrastructure, facilities, services, traffic management measures and other requirements to support expanded communities and the scale and type of development proposed. Therefore this will mean that infrastructure, services and facilities will be provided to support this new development, however given the scale of this development this is not likely to be significant.

As stated above both the landowner and developer have provided details that the site is effective. In relation to the site's development being too societally and aesthetically expensive this has been addressed above. In line with SPP (para. 95) (CD/03), development of this site will not see this settlement lose its identity nor suburbanise the countryside, but it should maintain and improve the community and support rural

business within and around the settlement.

Procedure

Councillor Mike Holmes (2013)

As detailed above within the section 'Allocation of Land for housing at Shillingworth', it was considered that the forecast need and demand for Renfrewshire and the draft indicators of the housing supply targets could be met from the established land supply with the inclusion of some additional brownfield and green belt releases. At the point of consulting on the Renfrewshire Main Issues Report (MIR) (CD/05), Shillingworth was not required to meet the housing land requirements. However as indicated above various changes have resulted in the need for the Renfrewshire Local Development Plan to identify additional green belt release to that indicated in the MIR to provide, in accordance with Scottish Planning Policy (CD/03), an effective and generous housing land supply.

Mr Ross McMath (1856)

As detailed above there was a requirement to identify sufficient housing land which required green belt release. This decision should not be regarded as a suspicious u-turn. The site considered appropriate for green belt release through and robust and comprehensive assessment.

Lisa Milner-Smith (2029)

The detail of any proposed housing development would be identified at the planning application stage.

Mrs Linda Begg (1931)

The council require developers and landowners to provide relevant information with regard to ensuring that the site is effective, thereby giving some certainty that if a site is identified within the proposed LDP then it is capable of being developed within the lifetime of the plan. Meetings and exchange of correspondence with various parties has taken place with every site included or not included within the proposed LDP to ensure that the right sites are being identified for development.

Site Boundary

Persimmon Homes (west) Scotland (186).

The council is in agreement to the altering of the sites boundary. The change is not to allow an increase in residential units at the site but to support a well structured landscape scheme which would lessen the impact of development of this site. If the Reporter is so minded to agree, the boundary should be altered on the LDP proposal map to reflect the boundary as submitted by the development.

General

Mr James Macaulay (107), Mr Ian McNab (214), Mrs Elaine Macleod (444), Thomas McNish (1915)

The impact on visual amenity has been covered above.

Mr James Macaulay (107), Mr Graham Hanley (198), Mr Ian McNab (214), Mrs Elaine Macleod (444), Mr Walter Reid (502), Dr Tracey Hanley (506), Christina Campbell (513), Mary Mungin (1916), Bridge of Weir Tennants & Residents Association (1923), Mr David Lang (1997)

Given the significant, well structured planting scheme that is being proposed by the developer, the site will be detached from the existing Shillingworth Steading. Coalescence will not result by developing this site and a high quality design should ensure that it will relate well to the existing built form of the residential units of Shillingworth Place and Earl Place.

Mrs Theresa Olivant (200), Mr Ian McNab (214), Mrs Elaine Macleod (444), Mrs Jennifer Crawford (489), Alan Nicolson (501), Mr Ross McMath (1856), Mr R. Stanley Chalmers (1905), Ms. Kathleen Tuck (1912), Thomas McNish (1915), Mr David Mills (1995), Rob Golbourn (2011), Lisa Milner-Smith (2029)

The scale of the development as well as the location of the site adjacent to existing residential units will not result in a significant impact on existing residential amenity.

Councillor James W.H. MacLaren (1998), Lisa Milner-Smith (2029)

The site has the ability to be designed to relate well to existing housing without any impact on overlooking or properties being dwarfed. The mix, density, design, layout and access arrangements will be detailed through a planning application.

Mrs Theresa Olivant (200), Christine Clark (1863), James Clark (1867)

The lowering of current house values along with the need to increase policing due to potential increases in risk to security or crime levels are not planning considerations for the development plan.

Mr Nigel Hedley (453), Carol Mackay (505), Christina Campbell (513), Mr Ross McMath (1856) Mr R. Stanley Chalmers (1905), Mary Mungin (1916), Bridge of Weir Tennants & Residents Association (1923), Ms Janet Reid (1983), MS IA McCallum (1984), Dorothy Motherwell (1985), Mr Iain Mackay (1986), Karen Carruth (2047)

It is agreed that the current economic circumstances is having an impact on the delivery and sale of houses but it is recognised in SPP (CD/03) (paragraph 76) that the functioning of the housing market is outwith the direct control of the planning authority. However within the proposed LDP a generous supply of housing land requires to be identified, this site emerged as one of the more appropriate areas to develop, particularly due to it being located adjacent to the existing built-up area.

Mr Ian McNab (214)

The existing built form of the residential streets of Shillingworth Place and Earl Place lend themselves to forming a well connected relationship to future residential development.

Alan Nicolson (501)

Given the scale of the potential development, an increase in noise, light and gas pollution is unlikely to be significant to the detriment of the area.

Christine Clark (1863), James Clark (1867)

As detailed above it is unlikely that a site of this scale will have a devastating effect on the community. The proposed development can be well designed, have a relationship with the existing residential form; and structured planting and landscaping will lessen the impact on the landscape setting and character.

Mrs Linda Begg (1931), Bridge of Weir Community Council (2065)

The need for the site to meet the housing land requirements in the proposed LDP is clearly identified above.

Paterson Partners (2003)

As outlined it is considered that this is a sustainable site and the reasons for choosing this site to contribute to the housing land requirements are well documented in this Issue as well as in Issue 26.

Paterson Partners (2003), Mr Rob Golbourn (2011)

The area subject to the surface rock constraint is outwith the area for development. It forms part of the land required for well structured landscaping associated with the site.

SLG Technology Limited (2014), NCT Leather Limited (2017), Bridge of Weir Leather Company Limited (2023), Scottish Leather Group (2025).

There are many more houses that are closer to the Bridge of Weir Leather works than this site.

Derek Mackay (2032)

The impact to the rural nature of the immediate area is not likely to be significant given the scale of the site and the other design considerations that will be important in the development of this site.

In conclusion this site emerged as a desirable option because there are relatively few planning and environmental constraints and its scale means that those that do exist can be dealt with and resolved. The scale of the development also means that there would be no requirement for additional public transport infrastructure, the services and facilities in the village centre and schools could accommodate the development without significant impact and other requirements such as water and roads infrastructure can be dealt with by the developer. Although this allocation will result in the loss of greenfield land, given the requirement to provide sufficient effective land to meet the housing land requirement and the extensive site assessment carried out by the council, the location and scale can be justified.

Reporter's conclusions:

Allocation of site

1. In relation to the issues of consultation regarding this site, our examination of conformity with the participation statement as required by section 19(4) of the Town and Country Planning (Scotland) Act 1997, as amended, has concluded that the council has consulted on the plan and involved the public at least in a way it said it would in its participation statement, published in accordance with section 18(1)(a) of the Act.
2. As stated in the conclusions in the report on Issue 17, the proposed plan does not identify sufficient land on a range of sites which are effective or capable of becoming effective to meet the housing land requirement up to year 10 from adoption, ensuring a minimum of 5 years effective land supply at all times as required by SPP. In accordance with SPP the proposed plan prefers development of brownfield sites to greenfield sites. In Renfrewshire however, brownfield and other urban land which is suitable for residential development will not meet the housing need and demand, nor would it provide the generous and effective housing land supply required by SPP. Some greenfield land will be required to maintain a supply of effective land.
3. In 2012 the council undertook a strategic review of the Renfrewshire green belt (CD49) as part of the preparation for the plan. That review recognised that a limited release of green belt land was not essential, in terms of the quantity of future development land required during the life time of the plan, but desirable to provide increased range, choice and generosity of development sites, providing the flexibility as indicated by the Scottish Government. Taking into account the SDP's optimistic growth and demographic scenario, the review selected a small number of locations for release from the green belt, for development. The selected green belt release sites are at a scale that can be supported by existing infrastructure.
4. The review indicated that the green belt sector in which this site is situated has areas of strengths and weaknesses. There is potential opportunity in the sector for small scale development, limited to discrete sites, but these sites would require good design, layout, enhanced landscaping and provide opportunities to enhance the green network. The review has found this site to be acceptable for release from the green belt with no or minimal constraints, and capable of development in the next 5 years. The council has stated that the landowner and the developer have confirmed that the site is effective.

Support for development

5. The support for the proposed development expressed by Persimmon Homes (west) Scotland and Ranfurly Estate are not unresolved representations and do not require to be considered as part of the local plan examination. The issues of capacity and site boundary are dealt with below.

Landscape

6. The council's Landscape Assessment Summary is contained in CD06. That states that the part of the original site advanced for development, which is elevated, is prominent within the wider landscape and visible on the approach to Bridge of Weir. Developing this section of the site is likely to visually alter the setting of the settlement. The lower part of the site towards the existing residential units may be suitable for an appropriate small

scale development that does not significantly alter the visual amenity of this area. Having regard to my own observations at the site and in the surrounding area, I agree with that assessment.

7. The site allocated in the local plan forms only the eastern part of the site which was considered at the Public Local Inquiry in 2004 (CD16). The allocated site lies at a lower level than the western and northern parts of the original site and is therefore much less prominent in the landscape than the remainder of the original site. The allocated site is bounded to the north and east by existing housing. Development of this much smaller site would have far less visual impact than development of the larger site, including the hilltop, which would be visible from all around. There would be no skyline development and because of the topography of the surrounding area, only the roofs of the proposed houses should be seen from Kilgraston Road. The provision of appropriate landscaping and retention of the existing topography would enable development on this smaller site to be readily accommodated within the landscape and be seen as a logical extension of the existing housing development. The council intends that a high quality design should ensure that the proposed development would relate well to the neighbouring built form to the east. That should minimise any impact upon existing residential and visual amenity. In this respect, I also note that the council has confirmed that the planting scheme proposed by the developer would ensure that the site would be separated from Shillingworth Steading. Having regard to all of the foregoing, I am satisfied that the proposal would represent a logical extension to the adjoining housing to the east.

Agricultural use

8. Paragraph 97 of SPP states that development on prime agricultural land should not be permitted unless it is an essential component of the settlement strategy or is necessary to meet an established need, for example for major infrastructure development, where no other suitable site is available. It also states that when forming the settlement strategy, planning authorities should consider the impact of the various options on prime quality agricultural land and seek to minimise its loss.

9. Paragraph 94 of SPP states that the requirement for development plans to allocate a generous supply of land to meet housing requirements, including for affordable housing, applies equally to rural and urban areas. Development plans should support more opportunities for small scale housing development in all rural areas, including new clusters and groups and extensions to existing clusters and groups. The site is obviously in agricultural use, apparently for grazing purposes, but the council has confirmed that it is not prime agricultural land. I see no reason why development of the allocated site would prevent access to neighbouring fields. In view of the foregoing, and for the reasons set out above, I do not consider that the site's existing use should act as a barrier to its allocation for housing.

Recreational use

10. While there may be informal recreational use made of the site I saw no evidence of that on my visit to the area. I accept, of course that there is a statutory right of responsible access to most land in Scotland but the fact remains that the primary use of the site is for agriculture. Development of the site would not prevent access to the surrounding area and the council has confirmed that the developer would be required to design in suitable access to connect into the existing residential area, to services and facilities, as well as to open space.

Green belt/countryside

11. As stated in paragraph 1 above, the proposed plan prefers development of brownfield sites to greenfield sites but some greenfield land will be required to maintain a supply of effective land. I accept that part of the Whitelint site can be considered to be brownfield and I address this matter, as well as other proposed development sites in Bridge of Weir, in Issue 26.

12. I agree with the findings of the Reporter in the Public Local Inquiry in 2004 (CD16) that the rear and side garden boundaries along the north and east sides of the site are inherently weak. Significant tree planting along the western boundary of the site would, in contrast, create a robust green belt boundary in the area. The line shown on the Proposals Map as the western boundary of the site appears to me to have been arbitrarily drawn and to bear no regard to physical features on the site. I agree with the council that the precise western boundary of the site would be best defined by topographical considerations and as part of a masterplanning process, rather than necessarily following the straight line shown on the Proposals Map. That masterplanning process would also define the built capacity of the site.

13. Since the site has been removed from the green belt in the local development plan and allocated for housing it would not be appropriate to assess any development proposal against green belt development criteria contained in the council's New Development Supplementary Guidance (CD09).

Biodiversity/flora/fauna

14. The council's overall strategic environmental assessment of the site summarised in CD06 states that SEA issues are limited to the impact that development of this site would have on the landscape and the amount of car journeys resulting in an impact on air quality. There is no mention of unacceptable impact upon biodiversity/flora/fauna. I find that unsurprising since the site simply comprises a field used for grazing purposes. For the same reasons set out in my conclusions in Issue 23 (paragraph 10), I am satisfied that there are sufficient safeguards in place to deal with issues that may affect any species, habitats and ecosystems on this site.

Traffic/access

15. I note the comments of the council's Roads Department in CD06 that access may be sought through the existing residential road layout. I also note that the council has stated that it will be a requirement of the development that Kilgraston Road be upgraded to adoptable standard. That would represent a considerable improvement in road and pedestrian safety terms upon the existing single track road. In view of this, the council may also wish to consider an access to the development from the upgraded Kilgraston Road even if only for construction traffic.

16. It is obvious that details of access, junctions, internal road layout and parking would require to be provided but that can be done at the stage of a planning application and should address any road safety/capacity concerns. Having regard to the foregoing, I find that any issues associated with traffic/access are unlikely to present this proposal with significant difficulty.

Infrastructure

17. I note that Scottish Water has agreed to work with developers to deliver sites and the landowner and developer have already confirmed to the council that the site is effective within the plan period. In any event, at the planning application stage, the developer will require to demonstrate the provision of adequate drainage and sewerage infrastructure.

18. The council has confirmed that capacity exists within existing primary and secondary schools to accommodate the development and I have seen no compelling evidence to the contrary.

Procedure

19. Our examination of conformity with the participation statement has concluded that the council has consulted on the plan and involved the public at least in a way it said it would in its participation statement, published in accordance with section 18(1)(a) of the Act. It is only after having been so satisfied that we proceeded to examine the proposed plan.

General

20. Impact or otherwise on house values is not a planning concern and the functioning of the housing market is outwith the council's control as is recognised in paragraph 76 of SPP. That paragraph also makes clear that councils, developers, service providers and other partners in housing provision should work together to both ensure a continuing supply of effective land and to deliver housing. Based on my observations of the surrounding area I fail to see how the proposed development could impact upon Bridge of Weir Leather Works.

21. In my opinion, having regard to all of the foregoing, based upon my own observations of the site and surrounding area, and subject to the definition of the western boundary of the site as part of a masterplanning process, I am satisfied that, subject to the undernoted modification, this site should be allocated for housing in the local plan.

Reporter's recommendations:

I recommend the following modification be made:

In Schedule 2 – Additional Housing Sites – Greenfield, in the section relating to Shillingworth, off Earl Place, Bridge of Weir, after the words “Green belt release” add the words “The precise western boundary of the site shall be defined by a masterplan approved by the council”.

Appendix 1: Body or person(s) submitting a representation raising the issue (including reference number):	
<p>STANDARD LETTER</p> <p>Mrs Teresa Mcquarrie [173] Mrs Debbie Kennedy [237] Anne Maria Brown [499] Elizabeth Campbell [588] Rosemary Ogilvie [589] Norma Hancock [590] Dr D Robb [591] Marjory Noble [592] Fiona Ramsay [593] Margaret Stewart [594] Campbell Mackellar [595] E Stevenson [596] Jenny Jackson [597] Laura Ferguson [598] Julianna Mackellar [599] G D McClure [600] Katarznya Holownia [601] Stuart Mitchell [602] M Lawson [603] Kirsty McKenzie [604] Mrs R Hawslay [605] Gregor Loose [606] Mrs Maureen Pepper [607] Jocelyn Young [608] Mrs M Reid [609] Mr J Fawkes [610] R Stump [611] Rachel Butter [612] James F [613] Gordon Aires [614] E Monks [615] Joyce Goater [616] Rhona Buchanan [617] Mr A Fraser [618] James Ballantyne [619] Mrs A Brown [620] Vivien Howe [621] J Tater [622] Anne Ferguson [623] Judith Evans [624] Judy Denton [625] Margaret Millar [626] David Denton [627] Julie Noble [628] Sheila Patterson [629]</p>	<p>Dr. Kenneth Muir [827] Francis Duffy [828] Duncan Walker [829] J Derry [830] Mary Fergusson [831] Dr. Alison Moss [832] Mr Archibald Butter [833] Mrs E McNicol [834] Sandy McKenzie [835] Norman Holmes [836] Ms Agnes McKechnan [837] Linda Wilbraham [838] Monika Siwy [839] Gerard O'Kane [840] Ms Iris Mackie [841] Moirra Galletly [842] Valerie Mackinnon [843] Anna MacDougall [844] Maureen Taggart [845] Annis Hutcheson [846] G. MacDougall [847] J. Bell [848] Marcella Wylie [849] M McKay [850] Spiers [851] M Geacha [852] Chris Gane [853] Kate Pinkerton [854] Alastair Gibson [855] Kenneth Waddham [856] Monica Aires [857] B Woodcock [858] Susan Stump [859] S Macpherson [860] Kenneth Barr [861] A Fox-Gardner [862] S. Yeaman [863] Joyce Bennie [864] Margaret Hart [865] Alan Bennie [866] J Naismith [867] Robert Hart [868] Norman Robertson [869] Irene Lamont [870] Anne Yeaman [871] Paul Corrigan [872] Anne Robertson [873] Christine Ramage [874]</p>

<p> Khawla Shibib [630] J. Lusk [631] Louise and George Greig [632] B McCann [633] David Fairbairn [634] Robert MacFarlane [635] Dr. A. Cunningham [636] D. Dormald [637] Mrs Jean Hardie [638] S Marijoan [639] Neil McAllister [640] Marjorie Mitchell [641] W. Mitchell [642] Ian Jackson [643] William Gordon [644] Nan Blair [645] June Dietz [646] Helen McGhee [647] Jennifer Harrison [648] John McCann [649] David Allan [650] Tom McGinn [651] Keith Sinclair [652] Gordon McGinn [653] Lynn Hayes [654] J Hayes [655] Robin Chisholm [656] Helen B [657] Jeffrey Alan Wilson [658] M Ballantyne [659] Marion Hoggan [660] Jane Hoggan [661] David Horton [662] M Inglis [663] Robert Paton [664] Allan Thomson [665] Janice Holmes [666] Jean Best [667] Melissa-Jade Adams [668] Maureen Sloan [669] Pauline Spence [670] Lynda Masterton [671] Elizabeth Smith [672] Barbara Abernethy [673] Brian Culshaw [674] Thomas Purrieth [675] Margaret McAllister [676] Ms Susan Paton [677] Peter Dickie [678] Mr Allan Edwards [679] Mr Robert Winters [680] McCartney [681] </p>	<p> Eleanor Caldwell [875] Danny Caldwell [876] Julie Reid [877] Mrs Evelyn Watson [878] R. E. Young [879] Mr and Mrs Inglis [880] Alice Johnstone [881] Miss Margaret Dymond [882] Thomas Rae [883] Michael Dickson [884] Ms Helen Loose [885] H. Gillies [886] Ms Keri Gage [887] Graham Gillies [888] Mr Martin Authur [889] Graham Thursby [890] C Currie [891] William Hunter [892] V Honiball [893] Mrs Brenda Thursby [894] Anne McClymont [895] Ms Hazel Loughray [896] R Pinkerton [897] Ms Mary Millar [898] Laura Allan [899] Elaine Grimes [900] Linda Lyon [901] Darren Bogle [902] Barbara Barr [903] Ms Annie Hallyburton [904] Emma Gillies [905] J Hall [906] J Mungin [907] Glen Gillies [908] Paul Matthews [909] Mr Andrew Cook [910] Katharne Berry [911] Ms Anne Sloan [912] Chris Gillies [913] W. Robb [914] Ms Morag Salmon [915] Georgina Sloan [916] Mr John Wilson [917] Christopher Gilzean [918] Laura MacFadyen [919] Stuart Millar [920] Mr Ian Colquhoun [921] Ross MacFadyen [922] Kim Cooper [923] Ms Helen o'neil [924] Philip Cooper [925] Cherie Guthrie [926] </p>
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<p>Alexander Cullen [683] E Drummond [684] Elizabeth Fairbairn [685] Hazel Russell [686] James Ogilvie [687] Mr David Mackinnon [688] Ms Janis Walton [689] Ewan MacLeod [690] Mr Malcolm Day [691] Julie Gibb [692] Ms Vikki Gibson [693] Ms Margaret Murray [694] Ms Liz Cotton [695] Ms Mary Lawson [696] Ronald Burnlee [697] J Crombie [698] L. Heda [699] Ms Johanne Begg [700] Ms Anne-Marie Crosier [701] Mr Michael Carr [702] Linda Mitchell [704] Gordon Mitchell [705] Mr Allan Rennie [706] Leonard Mitchell [707] Mr Duncan McCallum [708] Karen Rooney [709] Ms Lynn Cochrane [710] Birgit Uark [711] Ms Muriel Young [712] Mr Craig Anderson [713] Tony Horton [714] Mr Martin Sloan [715] Simon Stump [716] Ms P Telfer [717] M Winters [718] Elizabeth Bryce [719] Ms Gaynor Herd [720] Andrew Bryce [721] Ms Elizabeth Darven [722] Mr Graham Reid [723] Mr John McLaughlin [724] Ms Pamela Taylor [725] R.A. Durward [726] M. Mitchell [727] Ms Jennifer Durward [728] Mrs Sheena White [729] Mr Robert Rooney [730] Karen Little [731] Elizabeth Mailley [732] James Burnett [733] Emma Fulton [734] Laurie McLeod [735]</p>	<p>M Baxter [927] James Greenlees [928] Madelin Alt [929] Mrs Margaret Greenlees [930] Anne Allen [931] Marlene Preece [932] Richard Hughes [933] A Robertson [934] Maureen Hughes [935] Collette Robertson [936] Mrs Helen Bullen [937] Loren Robertson [938] Richard Lawler [939] Graham Evans [940] M Adamson [941] Anne Moodbeck [942] Alexander Bullen [943] David McKendrick [944] Margaret Mills [945] Jacqui Marshall [946] Robert Anderson [947] Mr L. Alton [948] Mr J. Gourlay [949] Mark Lindsay [950] R. Aitchison [951] Peter Abram [952] W.E Bain [953] Sandra Jordan [954] Elizabeth Johnstone [955] E Brown [956] R McIlroy [957] Ms Evelyn Mcdermid [958] Deborah Barton [959] Stuart Bell [960] Ms Eileen Ritchie [961] J. Dickson [962] Cath Bell [963] Sally Inglis [964] Miss Jean Inglis [965] Ms Tracey Lewick [966] Gillian Anderson [967] Ms Claire Sweeny [968] Mrs F. P. Clarke [969] Ms Caroline McGeachie [970] Ann Clark [971] Mina Donaldson [972] Mr Paul Morrell [973] Peter Rentoul [974] MR John Oliver [975] Ms Elaine Moore [976] J Cameron [977] Ms Gail Walsh [978]</p>
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<p>Sybil Paton [736] Alison Bogan [737] Christine Rettig [738] Heidi McLeod [739] Charles McColgan [740] Eileen Ritchie [741] Mary Mimmiagh [742] Roberta McTaggart [743] Jackie Orr [744] Margaret Martin [745] Glen Dawson [746] S Findley [747] Andrew Findlay [748] Ann McKenzie [749] Christine Sweeney [750] G Renton [751] Peter Weymark [752] Diana Rolland [753] William Wilson [754] Joan Green [755] L Mackenzie [756] Mrs Jean Thom [757] Ian McPherson [758] Daniel Nethery [759] Joan Baistow [760] Alexandrina Galbraith [761] Mr and Mrs I Cameron [762] Isobel McDonald [763] Scott Crerar [764] Mary Russell [765] Mathew Wallace [766] Elizabeth Dunn [767] John Cairney [768] Jane Dickie [769] Carole Cairney [770] Alan Brown [771] Juliet Kelly [772] R Lawrence [773] Mr A. D. McLeod [774] Margaret Howison [775] Thomas Kennedy [776] Graeme Murray [777] Rosemary Allan [778] J. G. Geddes [779] Arthur Howison [780] P Matheson [781] Albert Rennie [782] Mrs G Steven [783] Roderick Macleod [784] Liz Macleod [785] Colin Kerr [786] John Allan [787]</p>	<p>Ms Jean Monks [979] Mrs A.H. Adams [980] Ms Diane Sloan [981] Blair Calderwood [982] Mr Peter Svensson [983] Mrs Ailsa Gibson [984] Ms Gaynor Svensson [985] Brian Carr [986] Christine Stewart [987] J McMath [988] Mr Rory McMath [989] Gordon Millar [990] Ms Rosemary Read [991] Gary Montgomery [992] Mr James Alison [993] Ann Burnett [994] L Moore [995] Ann Hesselmann [996] Fiona Carey [997] Janice Bridge [998] Andrew Richardson [999] Margaret Richardson [1000] Rakesh Kishore [1001] Mr Jeff Webster [1002] Haydn MacPherson [1003] Rebecca Richardson [1004] Margaret Walker [1005] Erin MacPherson [1006] Ms Louise Hide [1007] Mary Macaskill [1008] W. W. Melvin [1009] Mr John Hagan [1010] Sandra MacPherson [1011] Elizabeth McClure [1012] Ms Clare Speir [1013] Khalid Qayum [1014] Stephen MacPherson [1015] Mr Robert Speir [1016] Mr Brian Cox [1017] M Jabbar [1018] Lisa Smith [1019] Mr David sangster [1020] Mr Alaistar Frood [1021] Emma Diamond [1022] Ms Pamela Cox [1023] Elaine Hendry [1024] Lunway Dhiya [1025] Robert Anderson [1026] Mr George Glen [1027] Diane Rotherforth [1028] Zara Dhiya [1029] Norman Grealey [1030]</p>
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<p>John O'Neill [788] Louise O'Neill [789] David Galbraith [790] Margaret Coats [791] J Houston [792] Morag Vaughan [793] Cleo Jackson [794] Nina MacDonald [795] Katherine Turner [796] L Sinclair [797] Susan Lawrie [798] Alistair Beaton [799] Mary Gray [800] Alan McCormack [801] Cllr. Maria Brown [802] Charlene Hambly [803] Moirra Johnston [804] John Ritchie [805] F.B Downie [806] John Newlands [807] Mrs Jill Russell [808] Mrs Patricia Chalmers [809] Debbie Newlands [810] John McFie [811] Ann Gardner [812] Dr. Hugh Donnachie [813] Mrs Anne Donnachie [814] Mr Philip McCulloch [815] Georgina Bream [816] Maureen Horton [817] Jim Robertson [818] Miss Catherine Noble [819] Mary Driver [820] F. Kelly [821] Mrs N. H. Ritchie [822] Mr Gordon Allen [823] Dr. Arthur Arnot [824] Donald Telfer [825] J Hetherington [826]</p>	<p>Ms Frances Glen [1031] Liam McCay [1032] Luay Kersan [1033] Ms Linda Hoskins [1034] Fraser McPhee [1035] Grace Blain [1036] Mrs Susan Carrigan [1037] Karem Hill [1038] J. Meikle [1039] Scott Sweetin [1041] Robert Ross [1042] Mr A Fleming [1043] Mrs R Fleming [1045] Mrs Isabel Malvin [1046] Mr Alan McLaughlin [1047] Lauren McLaughlin [1048] Mr David McKay [1049] Mr Wayne Butler [1050] Ms Amanda Abercrombie [1051] Ms Meg Robertson [1748] Ms Lynn Boswell [1750] D Taylor [1751] Mrs G Jones [1752] Mr Bruce Robertson [1753] Ms Mary Taylor [1754] Mrs Eleanor Robertson [1755] Mr T.H. Stewart [1757] Mr Walter Bannerman [1758] B Maltby [1759] Mrs J Nethery [1761] Joanna Nethery [1765] Ms Susan Sinclair [1767] Mr Donald F. Nicol [1770] Ms Margaret Wharton [1771] Dr Anne Jenkins [1772] Mr Daniel Nethery [1774] Bert & Veronica Rennie [1777] Mrs A MacDougall [2118]</p>
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Issue 23	Allocated Site: East Of Fleming Road, Houston	
Development plan reference:	Policy P3 – Additional Housing Sites, Schedule 2	Reporter: Ron Jackson
Body or person(s) submitting a representation raising the issue (including reference number):		
Standard Letter: See Appendix 1 attached.		
OTHER REPRESENTATIONS		
Dr and Mrs Lyons [285] Mrs Pauline Moss [328] Mr Angus Matheson [339] Mrs Mary Spalding [386] Cllr. Stuart Clark [437] Mr A.R Nicol [1854] Stewart Milne Homes [1883] David Wilson Homes West Scotland [2095] Robert Holmes [2106] SEPA [2108] Houston Community Council [2036] Cllr. Allan Noon [2046]		
Provision of the development plan to which the issue relates:	Released for housing under Policy P3 with indicative capacity for the site set out in Schedule 2	
Planning authority's summary of the representation(s):		
Support		
<u>Stewart Milne Homes (1883)</u>		
Supports the development of land at East of Fleming Road as being appropriate for housing.		
Greenbelt and Landscape Character		
<u>Standard Letter (224, 493, 494, 499, 514, 642, 643, 656, 854, 954, 1026, 1028, 1042, 1047, 1048 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1288, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332,</u>		

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The development of this green field site is not compatible with the provisions of the Local Development Plan and Supplementary Guidance (CD/09). It does not meet any of the criteria listed under 'Acceptable Forms of Development in the Green Belt', 'Green Belt Development' or 'Housing in the Green Belt' outlined in the Supplementary Guidance. It would be impossible to maintain and enhance local landscape character if this site was developed.

Cllr. Stuart Clark (437)

The needless and negative impact on valued and much loved greenbelt land, the removal of land which serves as a historic boundary within the village and the possible development of greenbelt land in the village when two brownfield sites are currently available are the main concerns. There would be significant impact on the character of this site and therefore of the Green Belt; this is an area of natural beauty and no reasonable person could suggest the character of the area would be improved with a housing development.

Dr and Mrs Lyons (285)

These areas as are peaceful, green open spaces. The trees, bushes and hedgerows create an area of semi-rural woodland which is in keeping with the history of Houston.

Mr Angus Matheson (339)

Development of the site will cause visual intrusion, compromise the greenbelt designation and is not conducive to the proper planning of the area.

Ms Gillian Jamieson (1426)

Local residents feel strongly that we should do everything possible to protect our greenbelt for future generations. Once developed it is gone forever.

Elizabeth Christie (1743), Lynda Blackburn (1762), Ross Blackburn (1768), Mr Laurence Christie (1776)

The natural beauty of this land and the wildlife it hosts are astounding. The proposed alterations to this land would render the designated open space just another manmade garden.

Laurence Christie (1776)

Adding another housing estate to the village of Houston would cause it to feel much less of a country village. Development of this Green Belt land, the use of which has been unchanged for a generation, would only set a precedent for development of more rare and finite green belt land.

Mr Alan Nicol (1779)

The Council should concentrate its efforts on creating real long term employment instead of short term fixes which will be a blot on the landscape.

Mr A.R Nicol (1854)

This site forms an intrusion into the green belt, only approximately 20% of the boundary of the site being adjacent to the built up area. It will not be integrated with the existing residential area. It will also set a precedent for further development of the green belt as it forms part of a larger submission and the strip of land proposed for release north of the Houston Burn will provide no clear boundary to the green belt and will encourage demand for development to the north.

David Wilson Homes West Scotland (2095)

The Council's assessment states that the site could be easily integrated with the existing settlement, the configuration of the existing neighbouring development does not lend itself to easy integration, with no opportunity for linkages through to the neighbouring residential areas other than along Fleming Road. The site would effectively appear as a 'bolt-on', extending the settlement beyond its existing linear edge.

Houston Community Council (2036)

The possible change in land designation of areas of Houston appears to contradict Renfrewshire Council's own policy of encouraging the maintenance of Green Belt areas.

Cllr. Allan Noon (2046)

Housing developments in the Green Belt should only be considered under exceptional circumstances where no alternatives are available.

Agricultural use

Mr & Mrs Moody (1778)

The field adjacent to 1 Burnlea Crescent is not low grade grazing ground, but high quality agricultural land still capable of productive crops.

David Wilson Homes West Scotland (2095)

The Macaulay Institute Plans (Sheet 64) (Extract in CD/55) identifies land at Fleming Road, Houston as Class 3:1. In line with the requirements of the SPP (CD/03) and given its limited scale, the release of this site cannot be considered to be an essential component of the settlement strategy. Its loss from the supply of Prime Agricultural Land should therefore be resisted.

Open Space/Green Network

Standard Letter (224, 493, 494, 499, 514, 642, 643, 656, 854, 954, 1026, 1028, 1042, 1047, 1048, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1288, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1340, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1348, 1349, 1350, 1351, 1352, 1353, 1354, 1355, 1356, 1357, 1358, 1359, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 1388, 1389, 1390, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1399, 1400, 1401, 1402, 1403, 1404, 1405, 1406, 1407, 1408, 1409, 1410, 1411, 1412, 1413, 1414, 1415, 1416, 1417, 1418, 1419, 1420, 1421, 1422, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1430, 1431, 1432, 1433, 1434, 1435, 1436, 1437, 1439, 1440, 1441, 1442, 1443, 1444, 1445, 1446, 1447, 1448, 1449, 1450, 1451, 1452, 1453, 1454, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1483, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 1519, 1520, 1521, 1522, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1532, 1533, 1534, 1535, 1536, 1537, 1538, 1539, 1540, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1548, 1549, 1550, 1551, 1552, 1553, 1554, 1555, 1556, 1557, 1558, 1559, 1560, 1561, 1562, 1563, 1564, 1565, 1566, 1567, 1568, 1569, 1570, 1571, 1572, 1573, 1574, 1575, 1576, 1577, 1578, 1579, 1580, 1581, 1582, 1583, 1584, 1585, 1586, 1587, 1588, 1589, 1590, 1591, 1592, 1593, 1594, 1595, 1596, 1597, 1598, 1599, 1600, 1601, 1602, 1603, 1604, 1605, 1606, 1607, 1608, 1609, 1610, 1611, 1612, 1613,

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The site in its present state is a perfect fit for the Open Space policy in the Local Development Plan.

Mr A.R Nicol (1854)

The LDP has failed to take account of its own strategy in relation to the Green Network which shows Houston diagrammatically linked to adjoining settlements and which should include the two released sites (East of Fleming Road and Houston Road) for inclusion in the network.

Biodiversity/ Flora / Fauna

Standard Letter (224, 493, 494, 499, 514, 642, 643, 656, 854, 954, 1026, 1028, 1042, 1047, 1048, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1288, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1340, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1348, 1349, 1350, 1351, 1352, 1353, 1354, 1355, 1356, 1357, 1358, 1359, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 1388, 1389, 1390, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1399, 1400, 1401, 1402, 1403, 1404, 1405, 1406, 1407, 1408, 1409, 1410, 1411, 1412, 1413, 1414, 1415, 1416, 1417, 1418, 1419, 1420, 1421, 1422, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1430, 1431, 1432, 1433, 1434, 1435, 1436, 1437, 1439, 1440, 1441, 1442, 1443, 1444, 1445, 1446, 1447, 1448, 1449, 1450, 1451, 1452, 1453, 1454, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1483, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 1519, 1520, 1521, 1522, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1532, 1533, 1534, 1535, 1536, 1537, 1538, 1539, 1540, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1548, 1549, 1550, 1551, 1552, 1553, 1554, 1555, 1556, 1557, 1558, 1559, 1560, 1561, 1562, 1563, 1564, 1565, 1566, 1567, 1568, 1569, 1570, 1571, 1572, 1573, 1574, 1575, 1576, 1577, 1578, 1579, 1580, 1581, 1582, 1583, 1584, 1585, 1586, 1587, 1588, 1589, 1590, 1591, 1592, 1593, 1594, 1595, 1596, 1597, 1598, 1599,

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With recent climate change, part of the site can now be described as wetlands and it is rich in birds and other wildlife.

Dr and Mrs Lyons (285)

The impact on the environment is immeasurable. These areas are home to a large variety of wildlife, including, foxes, deer, squirrels, bats, and many birds including owls, buzzards and pheasants.

Mr Angus Matheson (339)

Development will compromise the nature conservation on the site.

Elizabeth Christie (1743), Lynda Blackburn (1762), Ross Blackburn (1768), Mr Laurence Christie (1776)

Residents have regularly sighted bats and Herons in the area and believe them to be nesting within the green belt land. There are numerous other species of birds, frog/toads and other wildlife also making use of this habitat. In my opinion a more detailed, independent study into this should be carried out before any rezoning of this Green Belt land is considered. Development of the site may result in disturbance of resident vermin (rats) and create a problem along the Houston Burn.

Mr A.R Nicol (1854)

Houston Burn forms a wildlife corridor through the conservation village and represents a valued amenity to the local residents who benefit from leisure activities in and around the burn.

Suitability of Site

Standard Letter (224, 493, 494, 499, 514, 642, 643, 656, 854, 954, 1026, 1028, 1042, 1047, 1048, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1288, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318,

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The present sewage infrastructure cannot cope with current requirements. The site is a natural flood plain and its removal together with additional sewage from development would present a serious risk of contamination and flooding downstream in the Conservation Area.

The suggested diversion of the Houston Burn to solve the flooding problem would not help to mitigate existing problems, nor is it a valid resolution for an active flood plain that can safely retain millions of litres of water at peak capacity. The risk of flooding can be mitigated only on the receipt of a detailed and comprehensive site survey that takes consideration of the increasing impact of climate change on precipitation levels and the risk of flash flooding. A flood plain cannot be removed without consequences. The cost of implementing suitable drainage infrastructure would be prohibitive and if the site is developed liability for any flooding and subsequent infrastructure damage would surely rest with the Council.

The Background Site Report Assessment (Site 2266) (CD/06) for the Main Issues Report gave the overall planning assessment of the site as 'not suitable for residential development due to constraints of access and flooding'. The situation with regard to both has got worse in the last two years. Why has the Council changed its mind?

Dr and Mrs Lyons (285), Ms Gillian Jamieson (1426)

The drainage problems in this area have been a source of distress in the past with raw sewage emanating from manholes in Houston and considerable concern remains that any further housing development will accentuate this problem and the consequential health hazard will be even worse than previously.

Mr Angus Matheson (339), Mr John Robertson (1407), Ms Agnes Holmes (1470)

Known lack of sewerage capacity and the proposal made by Muir, Smith Evans does not resolve the inability of the sewerage infrastructure to cope with current requirements let alone additional ones.

Mrs Mary Spalding (386)

The constant flooding from the Burn would make the site uninsurable. I also oppose any rezoning of the Greenbelt in Houston due to the lack of infrastructure and impact on the village.

Cllr Stuart Clark (437)

There is a huge amount of concern within Houston relating to the water/sewerage network serving the area and the possible danger posed by further demand on this over-stretched system. The suggestion that the Houston Burn may be diverted as a solution to the flooding issue does not take account of the environmental history of the area and may not assist.

Ms Gail Carvil (1425), Mr Chris Carvil (1446)

The issue of moving the Houston Burn is significant to the residents in the local area as it borders the conservation village. The developers have greatly underestimated the volume of water stored in the flood plain. Re-routing the burn and constructing a bund (Dam) would create a significant danger for children who at present can play on the area of land. At present when the area floods it does not cause a problem for the residents along the burn as the flood plain does its job, a bund would significantly increase the risk predominantly to children and young people.

Ms Gillian Jamieson (1426)

Local residents are extremely concerned regarding the implications of building on the flood plain which may lead to flooding further downstream in the Conservation area at North / South Street and even impact upon the bridge at the Post Office on Bogstonhill Road. We are concerned that this would pose a threat to the Conservation area and that efforts to build flood defences in this section of the Village may be restricted as a result of this designation, whilst proving extremely costly to the taxpayer. Flash flooding also results in more overspill into the sewage infrastructure.

Mr A.R Nicol (1854)

There is no evidence of the council having carried out a detailed assessment of the flood risk on the site. The study commissioned by the developer is not conclusive and refers to the requirement for a more detailed Flood Risk Assessment. The site should not be

released from the green belt until the study is done.

Stewart Milne Homes (1883)

Stewart Milne Homes have confirmed that SEPA had previously identified part of the site as being at risk from flooding. A hydrologist has confirmed, however, that parts of the site limited to higher areas were developable. No development is proposed in the floodplain. It is recognised that a flood risk assessment will be required if a planning application is to be submitted. Measures addressing any existing flooding problems to the north of Burnlea Crescent would constitute a major benefit to residents and the wider community.

Houston Community Council (2036)

There is considerable doubt, not to mention anxiety, with regard to the ability of existing water and sewerage facilities to cope with more housing.

David Wilson Homes West Scotland (2095)

The extent of the flood risk is likely to limit the opportunities for compensatory storage within the site.

SEPA (2108)

Initially, SEPA had objected in principle to the inclusion of this site for residential development because it was Greenfield and that a significant part of it was at fluvial risk. This was consistent with SEPA's pre-planning response in April 2011 when they objected to the development of this site on flood risk grounds. SEPA have confirmed, however, that these views were not consistent with the views that were subsequently expressed by them at a meeting with Stewart Milne Homes and their consultants where it is now accepted by them that the principle of development is accepted at this site.

Traffic/Access

Standard Letter (224, 493, 494, 499, 514, 642, 643, 656, 854, 954, 1026, 1028, 1042, 1047, 1048, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1288, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1340, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1348, 1349, 1350, 1351, 1352, 1353, 1354, 1355, 1356, 1357, 1358, 1359, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 1388, 1389, 1390, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1399, 1400, 1401, 1402, 1403, 1404, 1405, 1406, 1407, 1408, 1409, 1410, 1411, 1412, 1413, 1414, 1415, 1416, 1417, 1418, 1419, 1420, 1421, 1422, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1430, 1431, 1432, 1433, 1434, 1435, 1436, 1437, 1439, 1440, 1441, 1442, 1443, 1444, 1445, 1446, 1447, 1448, 1449, 1450, 1451, 1452, 1453, 1454, 1455, 1456, 1457, 1458, 1459,

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Access to this site would be along South Street and Fleming Road. The South Street/Main Street crossroads is a known accident spot and turning out of Burnlea Crescent on to Fleming Road is hazardous. Fleming Road is narrow and has virtually no off street parking for residents. Road safety for school children is also a concern.

Dr and Mrs Lyons (285)

The road system in Houston is currently inadequate for the current size of population and any increase will obviously have a further impact with potentially dangerous consequences.

Mrs Pauline Moss (328)

Strongly object to rezoning this area and allowing more houses to be built, for the reason of added traffic in this area causing major problems.

Mr Angus Matheson (339)

Fleming Road due to its width and parked cars is not a satisfactory access road to serve further development.

Mrs Pauline Moss (328), Ms Gillian Jamieson (1426), Lynda Blackburn (1762), Ross Blackburn (1768), Laurence Christie (1776)

This is already a busy and congested road due to residents parking on the roadway and the additional traffic caused by the Strathgryffe Squash and Tennis Club. Increase in traffic poses a road safety issue, particularly for children accessing Abbey Nursery, the Scout hut and Gryffe High School and those playing outside.

Cllr. Stuart Clark (437)

The roads accessing this site are narrow and already heavily built up. They already struggle to cope with traffic accessing the Strathgryffe Tennis Club and there are on-going concerns regarding accidents occurring at this junction within the village.

Mr A.R Nicol (1854)

The road layout proposed by the developer will result in cars from new housing coming on to a T-junction onto Burnlea Crescent immediately adjacent to the T-junction of Burnlea Crescent with Fleming Road. This clearly does not meet appropriate road standards. On the basis of inadequate access the site should not be released.

Houston Community Council (2036)

Increased house building will result in an increase in traffic flow making worse an already difficult situation. Existing public transport difficulties through poor servicing would be exacerbated by the advent of more housing.

School Capacity

Standard Letter (224, 493, 494, 499, 514, 642, 643, 656, 854, 954, 1026, 1028, 1042, 1047, 1048, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1288, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1340, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1348, 1349, 1350, 1351, 1352, 1353, 1354, 1355, 1356, 1357, 1358, 1359, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 1388, 1389, 1390, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1399, 1400, 1401, 1402, 1403, 1404, 1405, 1406, 1407, 1408, 1409, 1410, 1411, 1412, 1413, 1414, 1415, 1416, 1417, 1418, 1419, 1420, 1421, 1422, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1430, 1431, 1432, 1433, 1434, 1435, 1436, 1437, 1439, 1440, 1441, 1442, 1443, 1444, 1445, 1446, 1447, 1448, 1449, 1450, 1451, 1452, 1453, 1454, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1483, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 1519, 1520, 1521, 1522, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1532, 1533, 1534, 1535, 1536, 1537, 1538, 1539, 1540, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1548, 1549, 1550, 1551, 1552, 1553, 1554, 1555, 1556, 1557, 1558, 1559, 1560, 1561, 1562, 1563, 1564, 1565, 1566, 1567, 1568, 1569, 1570, 1571, 1572, 1573, 1574, 1575, 1576, 1577, 1578, 1579, 1580, 1581, 1582, 1583, 1584, 1585, 1586, 1587, 1588, 1589, 1590, 1591, 1592, 1593, 1594, 1595, 1596, 1597, 1598, 1599, 1600, 1601, 1602, 1603, 1604, 1605, 1606, 1607, 1608, 1609, 1610, 1611, 1612, 1613,

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Contrary to the proposals, local schools, particularly the High School could not accommodate children from the additional houses.

Dr and Mrs Lyons (285), Mr Angus Matheson (339)

The schooling situation in Houston has been the subject of very well supported public debates and the universal opinion from the residents of Houston was that the schools could not cope with any further new house building in Houston.

Ms Gillian Jamieson (1426)

It is unclear what provision the council would make to provide schooling for this increase in the Village's population. Would the increased population mean an alteration to the catchment areas for the three schools resulting in other areas of the Village being excluded to accommodate children from the new housing?

Houston Community Council (2036)

Local schools have historically faced major difficulties in coping with the demands placed on them by an increasing population up to and beyond their designated capacity, to the significant detriment of the pupils already there.

Scale of Development

Standard Letter (224, 493, 494, 499, 514, 642, 643, 656, 854, 954, 1026, 1028, 1042, 1047, 1048, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1288, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1340, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1348, 1349, 1350, 1351, 1352, 1353, 1354, 1355, 1356, 1357, 1358, 1359, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 1388, 1389, 1390, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1399, 1400, 1401, 1402, 1403, 1404, 1405, 1406, 1407, 1408, 1409, 1410, 1411, 1412, 1413, 1414, 1415, 1416, 1417, 1418, 1419, 1420, 1421, 1422, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1430,

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The scale of development is unable to be supported by existing infrastructure, services and facilities.

Mrs Mary Spalding (386), Houston Community Council (2036)

Current infrastructure in the locality is barely able to cope with the demands of a population which has increased as a result of newbuild over recent years.

Cllr. Stuart Clark (437)

The village has grown considerably, well beyond the services planned for the area.

Stewart Milne Homes (1883)

It is considered that the indicative capacity of the site could be slightly increased beyond the 23 units shown in Schedule 2.

Site Boundary

Stewart Milne Homes (1883)

The site boundary should be amended on the proposals map to reflect the area required to accommodate the final engineering solution required to address existing and future flood risk issues. Such an area could involve any part of the land between the properties on Burnlea Crescent to the South and the foot of the wooded embankment to the North.

Local Amenities

Standard Letter (224, 493, 494, 499, 514, 642, 643, 656, 854, 954, 1026, 1028, 1042, 1047, 1048, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1288, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1340, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1348, 1349, 1350, 1351, 1352, 1353, 1354, 1355, 1356, 1357, 1358, 1359, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 1388, 1389, 1390, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1399, 1400, 1401, 1402, 1403, 1404, 1405, 1406, 1407, 1408, 1409, 1410, 1411, 1412, 1413, 1414, 1415, 1416, 1417, 1418, 1419, 1420, 1421, 1422, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1430, 1431, 1432, 1433, 1434, 1435, 1436, 1437, 1439, 1440, 1441, 1442, 1443, 1444, 1445, 1446, 1447, 1448, 1449, 1450, 1451, 1452, 1453, 1454, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1483, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 1519, 1520, 1521, 1522, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1532, 1533, 1534, 1535, 1536, 1537, 1538, 1539, 1540, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1548, 1549, 1550, 1551, 1552, 1553, 1554, 1555, 1556, 1557, 1558, 1559, 1560, 1561, 1562, 1563, 1564, 1565, 1566, 1567, 1568, 1569, 1570, 1571, 1572, 1573, 1574, 1575, 1576, 1577, 1578, 1579, 1580, 1581, 1582, 1583, 1584, 1585, 1586, 1587, 1588, 1589, 1590, 1591, 1592, 1593, 1594, 1595, 1596, 1597, 1598, 1599, 1600, 1601, 1602, 1603, 1604, 1605, 1606, 1607, 1608, 1609, 1610, 1611, 1612, 1613, 1614, 1615, 1616, 1618, 1619, 1620, 1621, 1622, 1623, 1624, 1625, 1626, 1627, 1628, 1629, 1630, 1631, 1632, 1633, 1634, 1635, 1636, 1637, 1638, 1639, 1640, 1641, 1642, 1643, 1644, 1645, 1646, 1647, 1648, 1649, 1650, 1651, 1652, 1653, 1654, 1655, 1656, 1657, 1658, 1659, 1660, 1661, 1662, 1663, 1664, 1665, 1666, 1667, 1668, 1669, 1670, 1671, 1672, 1673, 1674, 1675, 1676, 1677, 1678, 1679, 1680, 1681, 1682, 1683, 1684, 1685, 1686, 1687, 1688, 1689, 1690, 1691, 1692, 1693, 1694, 1695, 1696, 1697, 1698, 1699, 1700, 1701, 1702, 1703, 1704, 1705, 1706, 1707, 1710, 1713, 1714, 1718, 1719, 1727, 1730, 1732, 1733, 1735, 1737, 1743, 1744, 1745, 1746, 1747, 1749, 1756, 1760, 1762, 1763, 1764, 1766, 1768, 1769, 1773, 1776, 1778, 1779, 1780, 1781, 1782, 1783, 1784, 1785, 1786, 1787, 1789) and

Ms Gillian Jamieson (1426)

The nearest bus stop is nearly half a mile away, the local shop is too small to cater for a full weekly shopping and the nearest suitable store meeting this requirement is more than half a mile away. There are no clear plans to make more services available. The local GP surgery is already stretched and the local dentist has closed their list for NHS patients.

Development Viability and Effectiveness of Site

Mrs Mary Spalding (386)

I wish to draw your attention to the fact that there is a Title issue which will prevent any

building on the above proposal site.

Stewart Milne Homes (1883)

It has been demonstrated that this site is effective and development can be expected to take place in the short to medium term.

David Wilson Homes West Scotland (2095)

If it is possible to mitigate against the potential flood risk, the associated costs could jeopardise the effectiveness of the site. This site cannot be considered to be effective and is unsuitable for greenbelt release over other more appropriate and effective sites within the West Renfrewshire Housing Market Area.

Funding of Infrastructure

Standard Letter (224, 493, 494, 499, 514, 642, 643, 656, 854, 954, 1026, 1028, 1042, 1047, 1048, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1288, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1340, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1348, 1349, 1350, 1351, 1352, 1353, 1354, 1355, 1356, 1357, 1358, 1359, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 1388, 1389, 1390, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1399, 1400, 1401, 1402, 1403, 1404, 1405, 1406, 1407, 1408, 1409, 1410, 1411, 1412, 1413, 1414, 1415, 1416, 1417, 1418, 1419, 1420, 1421, 1422, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1430, 1431, 1432, 1433, 1434, 1435, 1436, 1437, 1439, 1440, 1441, 1442, 1443, 1444, 1445, 1446, 1447, 1448, 1449, 1450, 1451, 1452, 1453, 1454, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1483, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 1519, 1520, 1521, 1522, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1532, 1533, 1534, 1535, 1536, 1537, 1538, 1539, 1540, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1548, 1549, 1550, 1551, 1552, 1553, 1554, 1555, 1556, 1557, 1558, 1559, 1560, 1561, 1562, 1563, 1564, 1565, 1566, 1567, 1568, 1569, 1570, 1571, 1572, 1573, 1574, 1575, 1576, 1577, 1578, 1579, 1580, 1581, 1582, 1583, 1584, 1585, 1586, 1587, 1588, 1589, 1590, 1591, 1592, 1593, 1594, 1595, 1596, 1597, 1598, 1599, 1600, 1601, 1602, 1603, 1604, 1605, 1606, 1607, 1608, 1609, 1610, 1611, 1612, 1613, 1614, 1615, 1616, 1618, 1619, 1620, 1621, 1622, 1623, 1624, 1625, 1626, 1627, 1628, 1629, 1630, 1631, 1632, 1633, 1634, 1635, 1636, 1637, 1638, 1639, 1640, 1641, 1642, 1643, 1644, 1645, 1646, 1647, 1648, 1649, 1650, 1651, 1652, 1653, 1654, 1655, 1656, 1657, 1658, 1659, 1660, 1661, 1662, 1663, 1664, 1665, 1666, 1667, 1668, 1669, 1670, 1671, 1672, 1673, 1674, 1675, 1676, 1677, 1678, 1679, 1680, 1681, 1682, 1683, 1684, 1685, 1686, 1687, 1688, 1689, 1690, 1691, 1692, 1693, 1694, 1695, 1696, 1697, 1698, 1699, 1700, 1701, 1702, 1703, 1704, 1705, 1706, 1707, 1710, 1713, 1714, 1718, 1719,

1727, 1730, 1732, 1733, 1735, 1737, 1743, 1744, 1745, 1746, 1747, 1749, 1756, 1760, 1762, 1763, 1764, 1766, 1768, 1769, 1773, 1776, 1778, 1779, 1780, 1781, 1782, 1783, 1784, 1785, 1786, 1787, 1789) and Mrs Gail Carvill (1425), Mr Chris Carvill (1446), Mr Brian McAllister (1448), Ms Beth MacLeod (1453), Ms Agnes Holmes (1470), Elizabeth Christie (1743), Mr James Fraser (1745), Lynda Blackburn (1762), Niall MacLeod (1764), Ross Blackburn (1768), Russell Gibb (1769), Mr Laurence Christie (1776), Mr & Mrs Moody (1778), Mr Alan Nicol (1779), Robert Holmes (2106)

In order to address concerns about flood risk, measures would have to be put in place. The cost of implementing suitable drainage infrastructure would be prohibitive and would have to be borne by the developers (making the houses too expensive) or met from Council Tax funds (which would be a travesty).

Ms Gail Carvil (1425), Mr Chris Carvil (1446)

Local residents are extremely concerned about the implications of building on a flood plain which may result in flooding further downstream. They are concerned that this will pose a threat to the Conservation Area where the designation would restrict the building of flood defences and add to the cost of such works.

Procedure

Ms Gail Carvil (1425), Mr Chris Carvil (1446)

- The consultation process was not inclusive enough, as less than 2% of houses we made aware of the proposed change of use. A Freedom of Information request was submitted to find out more details about the development. This revealed that the burn at the bottom of my back garden was to be moved, I am concerned that such a vital part of the development was not included in the land development plan. Also it took me 20 working days to obtain this information within the 6 week consultation process, this system is flawed. The plan to reroute the burn should not be included in the land development plan “new or controversial elements of plan content should already have been aired at the main issues report stage (at least as options)” as stated in Scottish Government Circular 1/2009 (CD/51) para 55. The issue of moving the burn was not included in the last main issues report and did not make reference to flooding no longer being an issue despite previous main issue reports rejecting the land for development due to flooding. I feel that the developers have greatly underestimated the volume of water stored in the flood plain. Due to this I feel that the consultation process should be extended to 12 weeks.

Mr A.R Nicol (1854)

- Concerned about lack of a rigorous procedure for site selection.

General

Mr Angus Matheson (339), Mr A.R Nicol (1854)

The proximity of the tennis club and the kennels for the local hunt’s hounds are bad neighbour developments for the proposed residential land use, therefore, the site should not be released from the green belt.

Cllr. Stuart Clark (437)

Concerned about the removal of land which serves as a historic boundary within the village.

Mr James Jamieson (1412), Ms Gillian Jamieson (1426)

There has been an infringement of human rights as the proposed building on a flood plain will make my home liable to flood and damage, including from under provision of sewage works and potentially uninsurable, or insurable at an unaffordable rate.

Mr James Jamieson (1412), Elizabeth Christie (1743), Mr James Fraser 1745, Lynda Blackburn (1762), Russell Gibb (1769), Mr Laurence Christie (1776)

Development on this scale is not supported and it would totally ruin the ambience of this beautiful old village.

Ms Gillian Jamieson (1426)

The increase in air pollution caused by the additional traffic is also an issue.

Mr Brian McAllister (1448)

I don't believe that it is in the interests of our local community to put more strain on our already stretched schools, roads, flood plains, sewage systems and conservation area as well as valuable green belt.

Ms Beth MacLeod (1453), Niall MacLeod (1764)

The Council must choose between supporting the landowner, or following its policies and the wishes of local residents.

Alan Nicol (1779)

I would be very sad to see the land around the village developed as I love the views from the Munt (North Mound).

Modifications sought by those submitting representations:

Withdrawal of the proposed rezoning of P3 East of Fleming Road for Houston. (386)

Remove residential Greenfield sites in Houston and add them to the Green Network. (1854)

The indicative capacity of the housing site east of Fleming Road, Houston (Schedule 2, Page 30) should be amended to indicate 30 units. The boundary of the allocated housing site east of Fleming Road should be amended as per the attached indicative layout drawing to include all of the land that could be required to mitigate any existing or future flood risk problems. (1883)

It is submitted that land East of Fleming Road, Houston should remain within the green

belt and should be removed as a housing allocation from Schedule 2 and the Proposals Map as a housing allocation. (2095)

Delete in its entirety the item starting 'East of Fleming Road, Houston in Schedule 2- Additional Houston Sites – Greenfield, on page 30 of the Proposed Plan. Standard Letter (224, 493, 494, 499, 514, 642, 643, 656, 854, 954, 1026, 1028, 1042, 1047, 1048, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1288, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1340, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1348, 1349, 1350, 1351, 1352, 1353, 1354, 1355, 1356, 1357, 1358, 1359, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 1388, 1389, 1390, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1399, 1400, 1401, 1402, 1403, 1404, 1405, 1406, 1407, 1408, 1409, 1410, 1411, 1412, 1413, 1414, 1415, 1416, 1417, 1418, 1419, 1420, 1421, 1422, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1430, 1431, 1432, 1433, 1434, 1435, 1436, 1437, 1439, 1440, 1441, 1442, 1443, 1444, 1445, 1446, 1447, 1448, 1449, 1450, 1451, 1452, 1453, 1454, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1483, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 1519, 1520, 1521, 1522, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1532, 1533, 1534, 1535, 1536, 1537, 1538, 1539, 1540, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1548, 1549, 1550, 1551, 1552, 1553, 1554, 1555, 1556, 1557, 1558, 1559, 1560, 1561, 1562, 1563, 1564, 1565, 1566, 1567, 1568, 1569, 1570, 1571, 1572, 1573, 1574, 1575, 1576, 1577, 1578, 1579, 1580, 1581, 1582, 1583, 1584, 1585, 1586, 1587, 1588, 1589, 1590, 1591, 1592, 1593, 1594, 1595, 1596, 1597, 1598, 1599, 1600, 1601, 1602, 1603, 1604, 1605, 1606, 1607, 1608, 1609, 1610, 1611, 1612, 1613, 1614, 1615, 1616, 1618, 1619, 1620, 1621, 1622, 1623, 1624, 1625, 1626, 1627, 1628, 1629, 1630, 1631, 1632, 1633, 1634, 1635, 1636, 1637, 1638, 1639, 1640, 1641, 1642, 1643, 1644, 1645, 1646, 1647, 1648, 1649, 1650, 1651, 1652, 1653, 1654, 1655, 1656, 1657, 1658, 1659, 1660, 1661, 1662, 1663, 1664, 1665, 1666, 1667, 1668, 1669, 1670, 1671, 1672, 1673, 1674, 1675, 1676, 1677, 1678, 1679, 1680, 1681, 1682, 1683, 1684, 1685, 1686, 1687, 1688, 1689, 1690, 1691, 1692, 1693, 1694, 1695, 1696, 1697, 1698, 1699, 1700, 1701, 1702, 1703, 1704, 1705, 1706, 1707, 1710, 1713, 1714, 1718, 1719, 1727, 1730, 1732, 1733, 1735, 1737, 1743, 1744, 1745, 1746, 1747, 1749, 1756, 1760, 1762, 1763, 1764, 1766, 1768, 1769, 1773, 1776, 1778, 1779, 1780, 1781, 1782, 1783, 1784, 1785, 1786, 1787, 1789)

No change suggested by all other representations

Summary of responses (including reasons) by planning authority:

Allocation of land for housing at East of Fleming Road

In accordance with Scottish Planning Policy (SPP) (CD/03) and Planning Advice Note (PAN) 2/2010 (CD/42), Renfrewshire's Local Development Plan is required to indicate a generous and effective supply of land for housing. The Housing Need and Demand Assessment (CD/38) for the proposed Glasgow and the Clyde Valley Strategic Development Plan sets out overall housing figures for a wider area. These have been translated at a local level into the Housing Supply Targets set out in the draft Renfrewshire Local Housing Strategy 2011 – 2016 (CD/39) and were used to inform the Renfrewshire Local Development Plan Main Issues Report (CD/05).

At the consultation stage of the Main Issues Report (MIR) (CD/05) in December 2011, it was indicated that additional land would require to be identified to provide a generous and effective housing land supply. Brownfield and green belt sites were identified to meet the overall housing land requirement set at that time; it was not considered necessary to include East of Fleming Road to meet the requirement. Since the consultation on the MIR and the production of the proposed Renfrewshire Local Development Plan through 2012, however, there have been some changes, alterations and updates that required to be taken into account as they have resulted in a the need for more green belt land to be identified to meet Renfrewshire's housing land requirements. The following changes/updates required to be considered in the production of the proposed LDP:

- The 2012 Housing Land Audit (CD/ 38) indicated a decrease in effective land supply, as in the current economic climate some sites would no longer be considered effective and deliverable within 5 years of the plan. This was agreed through discussion with Homes For Scotland;
- A decrease in the number of sites in the housing land supply which were considered as being no longer able to become effective within the plan period;
- In line with the average outputs of housebuilders, the programming for many large sites was decreased to a maximum 25 units per annum per housebuilder which meant substantial reduction in programming for Bishopton and Johnstone South West Community Growth Areas as well as Renfrew North sites;
- The housing supply targets in the finalised Renfrewshire Local Housing Strategy (CD/39) had increased in line with the final indicative all-tenure housing requirement as set out in the adopted Glasgow and the Clyde Valley Strategic Development Plan (CD/02), therefore the housing land requirements in the LDP required to increase; and,
- Providing a generous supply of land for housing was indicated at anything up to 20% above the housing supply target, this required to be identified in the proposed LDP.

Although the site at East of Fleming Road was initially discounted at the Main Issues Report stage, the proposed LDP (pg 27) identifies that there is a need to address a shortfall in the supply of land for housing. Out of the sites identified to the Council through the Suggestions for Land Use Change and the MIR submissions, the site at East of Fleming Road was one of nine sites that were considered the most suitable locations for release for housing in terms of both planning and environmental considerations.

The sites submitted for a change in land use allocation went through a land use consideration planning sustainability assessment (CD/06), a strategic environmental assessment (CD/07) and a landscape assessment (CD/08) to assess the suitability of the site for development. The sites chosen for greenbelt release were identified to help

deliver sustainable communities that are in places which offer a high quality of life with a wide range of existing assets. The suitability of the site is addressed further in response to the representations made with respect to the site.

Support for Development

Stewart Milne Homes (1883)

The council welcomes the support.

Green belt and Landscape Character

Standard Letter, Cllr. Stuart Clark (437), Dr and Mrs Lyons (285), Mr Angus Matheson (339), Ms Gillian Jamieson (1426), Elizabeth Christie (1743), Lynda Blackburn (1762), Ross Blackburn (1768), Mr Laurence Christie (1776), Mr Alan Nicol (1779), Mr A.R Nicol (1845), David Wilson Homes West Scotland (2095), Houston Community Council (2036), Cllr. Allan Noon (2046)

All sites identified within Policy P3 including the site at East of Fleming Road have been removed from the green belt in the proposed LDP given that the land is proposed for residential development, therefore any consideration of this site against the requirements of the New Development SG (CD/09) under 'Acceptable Forms of development in the greenbelt' is not relevant.

In addition, the identification of East of Fleming Road as an additional housing site in the proposed LDP does not contradict the contents of the 'Strategic Green belt Review' (CD/49) as this land is clearly identified within this report as a site which is suitable for release. The review concluded that because the location of this site adjoins the settlement it can be integrated with the existing residential area. Due to the topography of the area, the site can be developed without setting a precedent for further development in the green belt.

Numerous assessments have been undertaken including a land use consideration planning sustainability assessment (CD/06), a strategic environmental assessment (CD/07) and a landscape assessment (CD/08) and it is considered that development of this allocated site was appropriate. The independent landscape assessment carried out on behalf of the council concludes that parts of the site maybe suitable for development, however, areas of the site are sensitive and should be retained and mitigation measures would be required to maintain the character of the settlement / green belt. The landscape assessment was fully considered in reaching the conclusion that this is a suitable housing site. The existing landscape, supplemented by additional landscape measures, would have the capacity to accommodate development without impinging on the landscape setting or green belt boundary in this area.

The southern, western and northern boundaries of the site have established hedges; the eastern boundary is formed predominantly by the rear garden boundaries of residential properties and there are established tree belts immediately outwith the site to the north, south and west. All of these features provide a degree of containment to the site. Development of the site would not therefore result in a significant impact on the wider landscape character. There is a visual and physical connection with the settlement edge, therefore, although development of the site would represent a small loss of green belt at this location, it is a discrete area where robust boundaries are already in place.

There is a requirement to provide sufficient land to meet the housing land requirements. This cannot be met by the existing housing land supply and land in the green belt, across Renfrewshire requires to be allocated. The proposed LDP Strategy is to focus development on brownfield sites first and the council will aim to do this through the proactive approach which is outline in Issue 17 and 18. The site at East of Fleming Road has been identified to provide a generous range and choice of effective housing sites in Renfrewshire. In directing growth to the most appropriate locations the site was identified as having the least impact on the local landscape which would not significantly change the landscape character or visual profile of the area. Other sites suggested for potential residential development in Houston are assessed in Issue 29. The conclusion from assessment of all of these additional potential housing sites was that the setting of site at East of Fleming Road could maintain a robust boundary if developed and had the least impact on the landscape setting or character. The site would relate well to the existing settlement and could be integrated into the existing built form.

It is appreciated that green belt is greatly valued in settlements given they can be peaceful, green open spaces with many positive roles and features. The green belt makes up 74% of the overall land use within Renfrewshire. In fact even with the green belt release in this proposed LDP, the amount of land designated as green belt has actually increased from the adopted Renfrewshire Local Plan (2006). In the 2006 Renfrewshire Local Plan, 19,776 hectares of land are designated as green belt, and in the Renfrewshire proposed LDP 20,003 hectares of land are designated as green belt. This includes the deduction of all of the land associated with Paisley South Expansion Area and the nine green belt sites included in the list of sites within Policy P3. The reason for this is that the council has put land back into the green belt at Bishopton and Erskine which was previously allocated for development. For the reasons above we would disagree that the green belt is a scarce resource. The development of this small site, in Houston, is not considered to significantly reduce this land use. The green belt is tightly drawn around Houston to protect the landscape setting, directing development and growth to the most appropriate areas. This site can be developed without significantly impacting on the character, landscape setting or identity of the settlement therefore complies with Scottish Planning Policy (CD/03).

Agricultural Use

Mr & Mrs Moody (1778), David Wilson Homes West Scotland (2095)

Scottish Planning Policy (CD/03) considers that planning authorities should enable development in all rural areas which support prosperous and sustainable communities. SPP (CD/03) (para. 94) outlines that the requirement for development plans to allocate a generous supply of land to meet housing requirements applies equally to rural and urban areas and that plans should support more opportunities for small scale housing development. It is considered that development of this site will not prevent the surrounding fields from being actively farmed.

Open Space/Green Network

Standard Letter , Mr A.R Nicol (1854):

The Council does not agree that this site should be designated as open space. There is sufficient open space in and around Houston for passive and active purposes as well as

an abundance of green network corridors. There is no requirement for this site to be identified as open space.

The proposed LDP and new Development SG (CD/09) recognise that new development often provides an opportunity to improve the existing resource or provide increased access and routes to green spaces. The site connects visually and physically with the settlement edge and its development would create an opportunity improve access and improve links to the green network and open space in this area. It will be a requirement for the developer to provide suitable connections to and from the development to the surrounding area.

Biodiversity/ Flora / Fauna

Standard Letter, Dr and Mrs Lyons (285), Mr Angus Matheson (339), Elizabeth Christie (1743), Lynda Blackburn (1762), Ross Blackburn (1768), Mr Laurence Christie (1776), Mr A.R Nicol (1854)

As a requirement of developing any of the green belt sites it will be necessary to provide a detailed study of the existing biodiversity, flora and fauna at the site.

Biodiversity/flora/fauna issues associated with the development of this site were considered as part of the strategic environmental assessment which did not raise any significant issues. Any development proposal for this site will be assessed in line with the proposed LDP policies and the New Development SG (CD/09) ensuring biodiversity is protected and enhanced.

Suitability of Site

Standard Letter, Mr A.R Nicol (1854), David Wilson Homes West Scotland (2095)

In its initial assessments of this site the council in its analysis using our comprehensive flooding and drainage database recognised that flooding associated with this location was a consideration that could restrict its potential for future development or almost certainly parts of the site for development. In the preparation of the proposed LDP further information has subsequently been provided regarding and this was analysed by both the council and SEPA. In the advice provided by SEPA to Renfrewshire Council with regard to flood risk on this site, it was confirmed that on the basis of the review undertaken by J Riddell for Stewart Milne Homes, the principle of development at this location was accepted by SEPA. It is recognised that there are technical solutions available to resolve the flooding and drainage issues. It is recognised that there are parts of the site which cannot be developed and the watercourses present on the site will remain an important feature in the development.

Scottish Water has agreed that it will work with developers to deliver sites which may require them to provide the necessary infrastructure or services, or a contribution towards its provision, in order to mitigate the impact of development.

In line with proposed LDP policies and the New Development SG (CD/09), appropriate drainage and sewerage measures will be required to service the site. The developer confirms that this is an effective site capable of being developed in the plan period and has provided further information regarding flood risk. A full Flood Risk Assessment (FRA) as well as a Drainage Assessment (DA) will be required at the planning application stage. The FRA will determine the developable extent of the site and dictate the number of

housing units that it will be possible to achieve. Within Renfrewshire, the provision of both an FRA and a DA are not an unusual requirement as they are requested frequently given Renfrewshire historic flood history. This potential impact is not insurmountable and therefore is not considered as a constraint that prevents residential development.

Traffic/Access

Standard Letter, Cllr Stuart Clark (437), Dr and Mrs Lyons (2850, Mrs Pauline Moss (328), Mr Angus Matheson (339), Ms Gillian Jamieson (1426), Lynda Blackburn (1762), Ross Blackburn (1768), Mr Laurence Christie (1776), Mr A.R Nicol (1854) Houston Community Council (2036):

Development of any site is likely to result in increased traffic movements. The initial site assessment highlighted access as an issue requiring further consideration due to the existing constraints such as the width of the road and junction restrictions at the entrance to the site. Further details of the location and position of an access has been provided giving an indication that a suitable access can be provided at the site. The details of the access, junction design as well as footway provision will be assessed at the detailed planning application stage.

Although it is recognised that evening and weekend public transport services are limited, as with all of Renfrewshire's villages, there is public transport available and therefore the development is able to be served by sustainable modes of transport. Again given the scale of development, the impact on air quality, safety, parking and the condition of the roads will be limited. The developer will be required to design in suitable access to connect into the existing residential area, to services and facilities as well as to open space.

School Capacity

Standard Letter, Cllr Stuart Clark (437), Mrs Mary Spalding (386), Ms Gillian Jamieson (1426), Houston Community Council (2036)

Capacity exists within existing primary and secondary schools.

Scale of Development

Standard Letter, Cllr Stuart Clark (437), Mrs Mary Spalding (386), Houston Community Council (2036):

It is considered that existing services and facilities including schools could accommodate the development without significant impact. Other requirements such as water and roads infrastructure can be dealt with by the developer as it would do with any other development proposal.

Stewart Milne Homes (1883):

As previously indicated, the final capacity of the site will depend on the outcome of the Flood Risk Assessment providing the development extents.

Site Boundary

Stewart Milne Homes (1883):

It is recognised that the final site boundary may vary slightly to that proposed by Stewart Milne Homes in order to accommodate any engineering solution required to address existing and future flood risk issues. The precise extent of the site, however, cannot be established until the Flood Risk Assessment has been completed.

Local Amenities

Standard Letter, Ms Gillian Jamieson (1426)

It is considered that existing services and facilities could accommodate the development without significant impact.

The development of this site is in accordance with current planning and transport strategy and policy. Planning Advice Note (PAN) - 75 Planning For Transport (CD/50) suggests a maximum threshold of 1600m for walking is broadly in line with observed travel behaviour. The site is within walking distance of the nearest bus stop, playing fields/open space and local school and is also accessible to the village centre.

Development Viability and Effectiveness of Site

Mrs Mary Spalding (386)

The Council required that any sites submitted for consideration through the LDP should be effective and deliverable within the lifetime of the plan. It is the developer, landowner, housebuilder's responsibility to resolve any issues regarding ownership associated with the site.

Stewart Milne Homes (1883):

Details in relation to Proposal P3 are dealt with in Issue 18.

David Wilson Homes West Scotland (2095)

It is acknowledged that there will be costs associated with measures to mitigate any potential flood risk. The council required any sites to be effective and deliverable within the plan period, therefore, the developer should have already taken this factor into consideration and be satisfied that these costs would not have a significant detrimental impact on the effectiveness of the site.

Funding of Infrastructure and Services

Standard letter, Ms Laura Forbes (1402), Ms Kirsty Gillanders (1404), Mr John Robertson (1407), Mr James Jamieson (1412), Ms Gail Carvil (1425), Ms Gillian Jamieson (1426), Mr Chris Carvil (1446), Mr Brian McAllister (1448), Ms Beth McLeod (1453), Ms Agnes Holmes (1470), Ms Eileen Black (1743), Mr James Fraser (1745), Lynda Blackburn (1762), Niall McLeod (1764), Ross Blackburn (1768), Russell Gibb (1769), Mr Laurence Christie (1776), Mr and Mrs Moody (1778), Mr Alan Nicol (1779), Robert Holmes (2106):

It is noted that a number of representations raise concerns about the funding of infrastructure and services improvements, particularly in relation to flooding and drainage.

The proposed LDP states that developers will require to make good any infrastructure deficits associated with any new development, in terms of required infrastructure, facilities, services, traffic management measures and other requirements to support expanded communities and the scale and type of development proposed. This will ensure that the infrastructure, services and facilities will be provided to support this new development.

Procedure

Ms Gail Carvil (1425), Mr Chris Carvil (1426), Mr A.R Nicol (1845)

As detailed above within the section 'Allocation of Land for housing at East of Fleming Road', it was considered that the forecast need and demand for Renfrewshire and the draft indicators of the housing supply targets could be met from the established land supply with the inclusion of some additional brownfield and green belt releases. At the point of consulting on the Renfrewshire Main Issues Report (MIR) (CD/05), East of Fleming Road was not required to meet the housing land requirements. However as indicated above various changes have resulted in the need for the Renfrewshire Local Development Plan to identify additional green belt release to that indicated in the MIR to provide, in accordance with Scottish Planning Policy (CD/03), an effective and generous housing land supply.

As detailed above there was a requirement to identify sufficient housing land which required green belt release. This decision should not be regarded as a suspicious u-turn. The site considered appropriate for greenfield release through and robust and comprehensive assessment.

Conclusions

In conclusion this site emerged as a desirable option because there are relatively few planning and environmental constraints and its scale means that those that do exist can be dealt with and resolved. The scale of the development also means that there would be no requirement for additional public transport infrastructure, the services and facilities in the village centre and schools could accommodate the development without significant impact and other requirements such as water and roads infrastructure can be dealt with by the developer as it would do with any other such housing development. Although this allocation will result in the loss of greenfield land, given the requirement to provide sufficient effective land to meet the housing land requirement and the extensive site assessment carried out by the council, the location and scale can be justified. For the reasons outlined above this site will remain zoned as a housing site.

Reporter's conclusions:

Allocation of site

1. As set out in the conclusions to issue 17, there would be a shortfall in the amount of land allocated for housing across Renfrewshire. The presumption in SPP is that development will be directed towards sites in existing settlements where possible to make effective use of existing infrastructure. Brownfield sites are preferred to greenfield sites and this is a particular focus of the proposed plan. Two brownfield sites in Houston have been identified in Schedule 3 of the local plan as part of the effective land supply. In Renfrewshire however, brownfield and other urban land which is suitable for residential development will not meet the housing need and demand, nor would it provide the

generous and effective housing land supply required by SPP. Some greenfield land will be required to maintain a supply of effective land.

2. In 2012 the council undertook a strategic review of the Renfrewshire green belt (CD49) as part of the preparation for the plan. That review recognised that a limited release of green belt land was not essential, in terms of the quantity of future development land required during the life time of the plan, but desirable to provide increased range, choice and generosity of development sites, providing the flexibility as indicated by the Scottish Government. Taking into account the SDP's optimistic growth and demographic scenario, the review selected a small number of locations for release from the green belt, for development. The selected green belt release sites are at a scale that can be supported by existing infrastructure.

3. The review indicated that the green belt sector in which this site is situated has areas of strengths and weaknesses. There is potential opportunity in the sector for small scale development, limited to discrete sites, but these sites would require good design, layout, enhanced landscaping and provide opportunities to enhance the green network. The review has found this site to be acceptable for release from the green belt with no or minimal constraints, and capable of development in the next 5 years.

Support for development

4. The support expressed by Stewart Milne Homes is not an unresolved representation and does not require to be considered as part of the local plan examination.

Green belt and landscape character

5. The site is roughly 'L' shaped, gently undulating and open in character. It rises gently to the north and is currently used as a grazing field. The site is fairly well contained by established hedges and trees to the north, south and west. To the east lies the settlement of Houston with the back gardens of the houses of Burnlea Crescent adjoining the site. A burn flows through the site in a west to east direction. To the north west of the site lies the Strathgyffe Tennis and Squash Club, a collection of low rise buildings and open courts. To the north, west and south of the site lie open, gently rolling, arable and grazing fields.

6. As stated in paragraph 3 above, the council's green belt review (CD49) found this site to be acceptable for release from the green belt with no or minimal constraints, and capable of development in the next 5 years. The council has assessed the various sites put forward in an open and transparent manner. I see nothing to suggest that the approach of the council in identifying this site for residential development has been inappropriate or in some way flawed. The site already has development on two sides and connects visually and physically with the settlement edge. It could accommodate housing as long as the established trees are retained, which would contain the site. Additional landscape measures such as additional tree planting would further minimise any impact upon the landscape setting and maintain a robust green belt boundary in the area. Since the site has been removed from the green belt in the local development plan and allocated for housing it would not be appropriate to assess any development proposal against green belt development criteria contained in the council's New Development Supplementary Guidance (CD09). In my opinion, having regard to all of the foregoing and based upon my own observations of the site and surrounding area, development of the site, as proposed in the plan, would not be inappropriate.

Agricultural use

7. Paragraph 97 of SPP states that development on prime agricultural land should not be permitted unless it is an essential component of the settlement strategy or is necessary to meet an established need, for example for major infrastructure development, where no other suitable site is available. It also states that when forming the settlement strategy, planning authorities should consider the impact of the various options on prime quality agricultural land and seek to minimise its loss.

8. Paragraph 94 of SPP states that the requirement for development plans to allocate a generous supply of land to meet housing requirements, including for affordable housing, applies equally to rural and urban areas. Development plans should support more opportunities for small scale housing development in all rural areas, including new clusters and groups and extensions to existing clusters and groups. Based on my observations, it appears that the site is used for horse grazing and jumping. I saw no evidence of intensive agricultural use. In view of this, and for the reasons set out in paragraph 6 above, I do not consider that the loss of agricultural land in this case would justify the deletion of the allocation of the site for housing as proposed.

Open space/green network

9. There is no evidence of a shortage of open space in and around Houston even taking into account the proposed housing allocations. For the reasons set out above it is appropriate for this site to be removed from the green belt and allocated for housing.

Biodiversity/Flora/Fauna

10. The council's overall strategic environmental assessment of the site summarised in CD06 states that SEA issues are limited to the impact that development of this site would have on the landscape and setting of the area. There is no mention of unacceptable impact upon biodiversity/flora/fauna. Any development on the site would require to be preceded by an application for planning permission and the plan provides that all developments must be assessed against the plan policies and the guidance/criteria within the New Development Supplementary Guidance (CD09). In relation to biodiversity, the guidance states that:

- development should not adversely affect existing species, habitats and ecosystems;
- design and layout of sites encourages species dispersal through improving connectivity and habitat availability;
- adverse effects on species and habitats should be avoided with mitigatory measures and implementation strategies provided or compensation provided by biodiversity offsetting.

I am satisfied therefore that there are sufficient safeguards in place to deal with issues that may affect any species, habitats and ecosystems on this site.

Suitability of site with regard to flooding

11. SEPA has accepted that the principle of development of this site has been established. However, a full flood risk assessment will be required at the planning

application stage and the developable extent of the site, and the boundaries thereof, have yet to be determined. That will dictate the number of housing units that it will be possible to achieve. The council's New Development Supplementary Guidance (CD09) also provides that development proposals should comply with the principles of sustainable flood risk management. In view of the foregoing I do not consider that the site should be removed from the plan because of flooding risks.

Traffic/access

12. I note the comments of the council's Roads Department in CD06 that the access and junction to the site would require to be upgraded to adoptable standards with footway and lighting also required. Further details would also be required for a full traffic and transportation assessment. That can be done at the stage of a planning application and should be sufficient to address any road safety/capacity concerns. CD06 also shows that there is no difficulty with accessibility to the settlement centre, local services and green network on foot. Based on my observations at the site and in the surrounding area I do not disagree with that assessment.

School capacity

13. The council has confirmed that capacity exists within existing primary and secondary schools and I have seen no compelling evidence to the contrary.

Scale of development

14. As already stated, the capacity of the site will depend upon a flood risk assessment. Matters of servicing and other infrastructure issues can be dealt with at the planning application stage.

Effectiveness of development

15. It is the responsibility of the developer to ensure that any title problems are resolved but I have seen no compelling evidence to persuade me that the site would not be effective.

Procedure and consultation

16. Our examination of conformity with the participation statement has concluded that the council has consulted on the plan and involved the public at least in a way it said it would in its participation statement, published in accordance with section 18(1)(a) of the Act. It is only after having been so satisfied that we proceeded to examine the proposed plan.

Reporter's recommendations:

No modifications

Appendix 1: Body or person(s) submitting a representation raising the issue (including reference number):

<p>STANDARD LETTER</p> <p>Ms Joanne Pirret [224]</p> <p>Angela Edmiston [493]</p> <p>Amanda Hamilton [494]</p> <p>Anne Maria Brown [499]</p> <p>Mr Stephen Darroch [514]</p> <p>W. Mitchell [642]</p> <p>Ian Jackson [643]</p> <p>Robin Chisholm [656]</p> <p>Kate Pinkerton [854]</p> <p>Sandra Jordan [954]</p> <p>Robert Anderson [1026]</p> <p>Diane Rotherforth [1028]</p> <p>Robert Ross [1042]</p> <p>Mr Alan McLaughlin [1047]</p> <p>Ms McLaughlin [1048]</p> <p>H.J.C. Tulloch [1209]</p> <p>Irene Lumsden [1210]</p> <p>Robert Finnie [1211]</p> <p>Margo Evans [1212]</p> <p>Olive Tulloch [1213]</p> <p>Nicola Capper [1214]</p> <p>M.D. Finnie [1215]</p> <p>Neil Holmes [1216]</p> <p>Kenneth Hepburn [1217]</p> <p>Joe McCabe [1218]</p> <p>Andrew Chisholm [1219]</p> <p>Mrs Iris Simmet [1220]</p> <p>Pamela Chisholm [1221]</p> <p>Mr Daniel Gill [1222]</p> <p>Catherine Smith [1223]</p> <p>Jennifer Rankin [1224]</p> <p>M Winters [1225]</p> <p>Martin Finn [1226]</p> <p>Mrs S Hunter [1227]</p> <p>M Ferguson [1228]</p> <p>Thomas Smith [1229]</p> <p>Andrew Lightbody [1230]</p> <p>James Campbell [1231]</p> <p>Alan Vaughan [1232]</p> <p>Ann Campbell [1233]</p> <p>Alex Baird [1234]</p> <p>Anne Baird [1235]</p> <p>Norma McBeath [1236]</p>	<p>Mr Alex Nicol [1472]</p> <p>Ethel Hadden [1473]</p> <p>Ann Strawbridge [1474]</p> <p>Ms Doreen Anderson [1475]</p> <p>Mr H.M. Anderson [1476]</p> <p>Colin Berry [1477]</p> <p>Ms Laura Jane Lawson [1478]</p> <p>Margaret Stevenson [1479]</p> <p>M Campbell [1480]</p> <p>Campbell Mills [1481]</p> <p>M.A. Quinn [1482]</p> <p>Neil Yeaman [1483]</p> <p>Anne Wood [1484]</p> <p>Mr A Anderson [1485]</p> <p>Donna Easton [1486]</p> <p>William Kirkwood [1487]</p> <p>Andrina Kirkwood [1488]</p> <p>Lesley Hart [1489]</p> <p>Ms Elspeth Dawson [1490]</p> <p>Mrs M Rodger [1491]</p> <p>Ms Claire Boyd [1492]</p> <p>Ms Cheryl Stewart [1493]</p> <p>Ms Deborah Fadian [1494]</p> <p>Ms Julie Docherty [1495]</p> <p>Michael Poole [1496]</p> <p>Ms Gillian Graham [1497]</p> <p>Ms Laura Smillie [1498]</p> <p>Ms Liz Balfour [1499]</p> <p>Ms Hazel O'hare [1500]</p> <p>Ms Clare Smith [1501]</p> <p>Layla Forbes [1502]</p> <p>Ms Alexis Harvey [1503]</p> <p>Mr Jamie McNicol [1504]</p> <p>Ms Janice Stirling [1505]</p> <p>Ms Annie Johnston [1506]</p> <p>Mr Thomas Langley [1507]</p> <p>Mr Sandy McIntosh [1508]</p> <p>Mr Iain Cameron [1509]</p> <p>K Margery [1510]</p> <p>William Watt [1511]</p> <p>Ms Margaret Macleod [1512]</p> <p>Elizabeth Lightbody [1513]</p> <p>Miss Jean Aitken [1514]</p> <p>Mary Clayton [1515]</p>
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James McBeath [1237]	Elizabeth McPhee [1516]
Kenneth Rawson [1238]	Mrs M Griffin [1517]
Sharon James [1239]	Jayne Kyle [1518]
Heather Fiskin [1240]	Ms Jean Mills [1519]
Howard Enos [1241]	Elizabeth Thomson [1520]
A McNeil [1242]	Eddie O'Neill [1521]
Jennifer Henderson [1243]	John Gray [1522]
Barbara Morrison [1244]	Eileen Crocket [1523]
Aileen Culshaw [1245]	Jackie Whyte [1524]
Anne Thomson [1246]	Ms Helen Teese [1525]
Euphemia Donaldson [1247]	Margaret Jeffrey [1526]
Kenneth Campbell [1248]	Mr Philip Teese [1527]
Fiona Morrison [1249]	Mr Colin McLArnon [1528]
Margaret Moncrieff [1250]	Gary Fay [1529]
Mary Fanning [1251]	Catriona Connelly [1530]
James Collins [1252]	Mr D Holdbrook [1531]
Kay Farley [1253]	Ms Lisa Paton [1532]
Margaret Carruth [1254]	Tom Rowan [1533]
Michael McCulloch [1255]	Ms Joanne Thompson [1534]
Susan Greig [1256]	Scott Russell [1535]
Angus Mackay [1257]	Ms Shiela Cossar [1536]
P Mackay [1258]	Fiona Robinson [1537]
Bennet Smith [1259]	Irene Aitken [1538]
Alexandra Donaldson [1260]	Ms Morag Wilson [1539]
Doreen McGowan [1261]	Ms Angela Gribben [1540]
Ms Louise Welsh [1262]	Marjorie Wilson [1541]
Sandra MacPherson [1263]	Rev. Robert Chambers [1542]
Ms Margaret Gill [1264]	Ms Lorna Nelson [1543]
Ms Tracy McQuillan [1265]	Vincent Ivanski [1544]
Mr Donald Laurie [1266]	Elaine Hunter [1545]
Ms Janet Donaldson [1267]	Carolynne Kinnon [1546]
Mrs G Ham [1268]	Nicola Steele [1547]
Mr Craig Duncan [1269]	Lesley-Anne Evanceciala [1548]
Mr David Duncan [1270]	Eillean Kennedy [1549]
Mrs Alexanderina Duncan [1271]	Mr Jonathan Annan [1550]
Ms Cheryl Clark [1272]	Sally Hepburn [1551]
Ms Arlene Morrison [1273]	M Simpson [1552]
Tina Hay [1274]	Joy Chisolm [1553]
Mr Stephen Vosloo [1275]	Francis Kinloch [1554]
Jonathon Hay [1276]	Mr William Connolly [1555]
Ms Tracey McDonald [1277]	Mr Charles Simpson [1556]
Ms Fiona Murray [1278]	Elaine Rowan [1557]
Vivienne Ross [1279]	C. Kane [1558]
Ms Fiona Nuttall [1280]	Anne McKendrick [1559]
Ann Nimmo [1281]	Ms Moira Heyes [1560]
Ms Wilma Keenan [1282]	C Gillespie [1561]
Mr Sean Gray [1283]	Jenni Mason [1562]
Lisa Laverty [1284]	G Hannah [1563]
Mr Matthew Alexander [1285]	Ms Lesley Finn [1564]
Alan Gilmour [1286]	Mr Boyd [1565]
Ms Evie Anderson [1287]	Mrs L Connell [1566]
Ms Lindsay McCarron [1288]	Mr McCartney [1567]

Ms Louise Wilson [1289]	Mr Robert Gould [1568]
Lynne Fraser [1290]	William Haddow [1569]
Mrs E Kyle [1291]	Mr James Caldwell [1570]
M English [1292]	E Penaranda [1571]
Mr Paul Houston [1293]	Fiona Rodgers [1572]
Mrs S Gilks [1294]	Sandra Griffiths [1573]
Ms Nicola McAllister [1295]	Mr John Charteris [1574]
B Holmes [1296]	Kristen Andrews [1575]
Ms Marie Walker [1297]	Elizabeth Campbell [1576]
Ms Gillian McFarlane [1298]	Ms Caroline Redmond [1577]
Steven Davison [1299]	Janice Anderson [1578]
Ms Gillian Peters [1300]	Ms Laura Hams [1579]
Ms Fiona Kerr [1301]	Keith Barlow [1580]
Ms Aileen Graham [1302]	Margaret Carvil [1581]
Carole Finnie [1303]	Ms Lorraine Gilmour [1582]
. Ford [1304]	Desmond McCulloch [1583]
Dawn Kyne [1305]	John Carvil [1584]
Frank Holt [1306]	Ms Fiona Caldwell [1585]
R. MacGregor [1307]	V Kilian [1586]
Mrs Joan Spearing [1308]	John McKenzie [1587]
Mr Alan Calderwood [1309]	Ms Michelle Clark [1588]
Brian Harvey [1310]	Mr Fraser Ballantyne [1589]
Ms Sharon Larkin [1311]	Florence Galloway [1590]
Ms Fiona Christie [1312]	Ms Lisa Watson [1591]
Ms Libby Dunran [1313]	Ms Morag Sherif [1592]
Mrs P. McCallum [1314]	Nicki Barrett [1593]
Ms Ann Frew [1315]	Stan and Sheila Moore [1594]
F. Cameron [1316]	Ms Sharon Howard [1595]
Gordon Kyle [1317]	Mrs Anne Henderson [1596]
Ms Karen Heyes [1318]	Mrs. Marion Nicol [1597]
Mr Alan Stevenson [1319]	Ms Valerie Paterson [1598]
Ms Carly Heyes [1320]	Mr Richard Taylor [1599]
Barry Sillers [1321]	Christine Lawson [1600]
Ms Deborah Summerhill [1322]	Ms Lorna Kinloch [1601]
Ms Susan Orr [1323]	Ms Kerry Roberts [1602]
Martin Abel [1324]	Ms Margaret Wilson [1603]
Ms Karen Telfer [1325]	Ms Linda Basler [1604]
Mr Kenneth Mackinnon [1326]	Isobel Gallagher [1605]
Margaret McCabe [1327]	Gordon Galloway [1606]
Ms Beth Morris [1328]	Mr MacGeadie [1607]
Derek Loughlin [1329]	Mrs MacGeadie [1608]
Mr Ham [1330]	Nigel Jameson [1609]
Mr Alan Linton [1331]	Rita Jackson [1610]
Ann Grieve [1332]	Alexandra Spearing [1611]
Marie Richardson [1333]	Ms Helen Smith [1612]
Mr Craig Pollock [1334]	Shelagh Russell [1613]
Rachael Hassan [1335]	Karen Wilson [1614]
Ms Irene Sandham [1336]	Ms Marianne Boland [1615]
S Ballantyne [1337]	Lorna Torrens [1616]
Margaret Beattie [1338]	John McEwan [1618]
Ms Sabine Burkart [1339]	Kim Rotherforth [1619]
S Balantyne [1340]	Mrs. Susan Milliken [1620]

D. Hart [1341]	Samantha Stark [1621]
Ms Fiona Gaffney [1342]	Forrest Cunningham [1622]
Leanne Kelly [1343]	Margaret Clarkson [1623]
Ms Paula Galloway [1344]	Sharon Barlow [1624]
Norma Manwell [1345]	Ms Louisa Corlett [1625]
Ms Tracy Ferguson [1346]	Katherine Johnson [1626]
Ms Shirley Gibb [1347]	Mr. and Mrs. N. Clark [1627]
N Seddon [1348]	Phyllis Clark [1628]
Ray Williamson [1349]	Mr. and Mrs. Black [1629]
Ms Linda Smith [1350]	Jenny Dickson [1630]
Ms Gail Shaw [1351]	E Kinney [1631]
D Hurd [1352]	Angela Paterson [1632]
Alison Page [1353]	Pamela Redpath [1633]
Ms Catrina Houston [1354]	Laura Cook [1634]
Ann Nicolson [1355]	Mrs M. Thomson [1635]
Julie McCallum [1356]	David Furniss [1636]
Greg Lilley [1357]	David Gillanders [1637]
Mr Steve Bunden [1358]	Elaine Mills [1638]
Mr Euan Alison [1359]	F Shaw [1639]
Ms Gillian Hill [1360]	Jane Corr [1640]
William Milligan [1361]	Carol Ann Ronald [1641]
Ms Allyson Campbell [1362]	Colin Cliff [1642]
Ms Sharon Glasgow [1363]	Lesley McConaghie [1643]
Mr Jason Barrett [1364]	Graham Peters [1644]
W. Rowan [1365]	Aisha Davidson [1645]
Mr Gordon Bradford [1366]	Victoria Clark [1646]
Lyndsey McNab [1367]	Elita Storey [1647]
Ms Jennifer Baker [1368]	Maura Lynch [1648]
Sarah McKie [1369]	Elaine Rawson [1649]
Ms Adeline Burns [1370]	M Calvert [1650]
Kirsten Connolly [1371]	Fiona Murray [1651]
Mrs Alison Ritchie [1372]	Liz Quinn [1652]
June Borland [1373]	Leonora Campbell [1653]
Ms Isobel Stewart [1374]	Wendy Annan [1654]
Ms Tracy Graham [1375]	Claire Stewart [1655]
Ms Katrina Little [1376]	Jackie Byres [1656]
Ms Julie Whaley [1377]	V Graham [1657]
Angela McMaster [1378]	Stephen Devine [1658]
Barbara Snodgrass [1379]	Sandra Jeffrey [1659]
Kirsty Thompson [1380]	Stephen Callaghan [1660]
Brian McNab [1381]	Maxine McKenzie [1661]
Kathleen Jones [1382]	Susan MacIver [1662]
Karen Carmichael [1383]	Sheila McHarg [1663]
Kirsty Johnson [1384]	Jill Harrison [1664]
Alison Muir [1385]	Paul MacNeill [1665]
Mike Rotherforth [1386]	Tracey Pollock [1666]
Karen Craig [1387]	S Welsh [1667]
Lauren McGlaughlin [1388]	Zoey Hillman [1668]
Valerie Clegg [1389]	Susanne Gray [1669]
A.W. Scott [1390]	Ross Donaghy [1670]
Mrs N. McBarron [1391]	Elizabeth McGhee [1671]
Leigh Munro [1392]	David Donaldson [1672]

Derek Whittle [1393]	Julie Reid [1673]
Wendy Workman [1394]	Peter Richardson [1674]
Irene McGhee [1395]	Jane Brown [1675]
Janice Thomson [1396]	Joanne Furniss [1676]
Ms Kathleen Campbell [1397]	Clair Barclay [1677]
Ms Anna Ross [1398]	Sheila Buchanan [1678]
Janet Mason [1399]	Charlotte Taylor [1679]
Miss A M Cairns [1400]	M Gilmour [1680]
Mr John Fergus Stewart [1401]	John McFarlane [1681]
Ms Laura Forbes [1402]	Linda Anderson [1682]
Dr Kirsty Horne [1403]	Margaret Chambers [1683]
Ms Kirsty Gillanders [1404]	Ann Marie Gilroy [1684]
Mr Keith Wright [1405]	Mr William Wood [1685]
Ms Kathy McFall [1406]	Douglas Webb [1686]
Mr John Robertson [1407]	J McNeil [1687]
Mr Clive Henderson [1408]	Neil Sullivan [1688]
Mr John McDonald [1409]	Grant Cadden [1689]
C Morrison [1410]	A Anderson [1690]
Mr James Bufton [1411]	Ann Forsyth [1691]
Mr James Jamieson [1412]	A Cameron [1692]
Mr Iain Brown [1413]	Bernice Scott [1693]
Gwen McKerrell [1414]	Elizabeth Lawrie [1694]
Mr Ray Evans-Nixon [1415]	Paul Rutherford [1695]
Mr Gordon MacNicol [1416]	Ms Fiona Martin [1696]
Miss Gillian Logan [1417]	C. Keddie [1697]
Mr George Hollinsworth [1418]	J. Bright [1698]
Willie and Margaret Blackburn [1419]	Ms Lynda McLeod [1699]
Mr Ian Griffiths [1420]	Suzanne Bennion [1700]
Mr Roger S. Calvert [1421]	Ms Julie Devine [1701]
F Morrison [1422]	Mr David Jagger [1702]
Mr J.S Mclay [1423]	Ms Arlene McKay [1703]
J Taylor [1424]	George Allan [1704]
Ms Gail Carvil [1425]	Ms Claire Meiklejohn [1705]
Ms Gillian Jamieson [1426]	Ms Kathleen Ohare [1706]
Ms Isobel McNeil [1427]	Ms Maria Oto [1707]
Garry Turkington [1428]	Ms Dunlop [1710]
Stewart Morrison [1429]	Euan Allison [1713]
Ms Frances Campbell [1430]	N Sneddon [1714]
Sandra Brown [1431]	Ms Cliff [1718]
Ms Moira Dunop [1432]	Ms Duncan [1719]
Dr Stephen Friel [1433]	William Woods [1727]
Carol McLeod [1434]	Robert Barr [1730]
Mr Darren John Rix [1435]	Donna Easton [1732]
Mary Sheilds [1436]	Margaret Stevenson [1733]
Joanna Horner [1437]	Ms Eileen Black [1735]
Mr John MCKECHNIE [1439]	Dr William Manley [1737]
Mr Douglas Passway [1440]	Elizabeth Christie [1743]
Mr William I Jefferson [1441]	Ms Hilary Fraser [1744]
Joan Kyle [1442]	Mr James Fraser [1745]
Clemency Webb [1443]	Mr Jim McGeachy [1746]
Mrs E Johnstone [1444]	Mrs Ann McGeachy [1747]
M Howe [1445]	Margaret Fraser [1749]

<p>Mr Chris Carvil [1446] Robert Barn [1447] Mr Brian McAllister [1448] Colin Wade [1449] James McGhee [1450] Ms Alyson Craig [1451] Mary Chambers [1452] Ms Beth MacLeod [1453] Janice Watt [1454] Carole Cameron [1455] Mr Anthony Forbes [1456] Robert Sullivan [1457] Jennifer Cowan [1458] Margaret Barr [1459] W.J. Strawbridge [1460] Mrs C Wishart [1461] Mr Allan Black [1462] J MacLeod [1463] Morag Sinclair [1464] Robbie Wishart [1465] Ms Christine McCann [1466] Ms Christine Gibb Stewart [1467] Ms Marion Hay [1468] Andy Wishart [1469] Ms Agnes Holmes [1470] Robert Hadden [1471]</p>	<p>Mrs Julie Anne Gibb [1756] Mrs Jennifer Logan [1760] Lynda Blackburn [1762] Linda Smith [1763] Niall MacLeod [1764] Mr Neill Hendry [1766] Ross Blackburn [1768] Russell Gibb [1769] Richard Bardell [1773] Mr Laurence Christie [1776] Mr & Mrs Moody [1778] Mr Alan Nicol [1779] Nigel Dick [1780] Anna Dick [1781] Sherry Burns [1782] Mr William Fraser [1783] Sheila Friel [1784] Mr Allan Gibson [1785] Mr Allan George Logan [1786] Mr Alan McPherson [1787] Mr Douglas Robertson [1789]</p>
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Issue 24	Allocated Site (P3) Houston Road Houston	
Development plan reference:	Policy P3 – Additional Housing Sites, Schedule 2	Reporter: Ron Jackson
Body or person(s) submitting a representation raising the issue (including reference number):		
Standard Letter: See Appendix 1 attached.		
OTHER REPRESENTATIONS		
Park Lane (158) Dr and Mrs Lyons (285) Mr Angus Matheson (339) Mrs. Mary Spalding (386) Cllr. Stuart Clark (437) Mr W Thomson (1808) Mr A.R Nicol (1854) Houston Community Council (2036) Cllr Allan Noon (2046) David Wilson Homes West Scotland (2095)		
Provision of the development plan to which the issue relates:	Released for housing under Policy P3 with indicative capacity for the site set out in Schedule 2	
Planning authority's summary of the representation(s):		
<u>Park Lane (158)</u> Support for allocation of the site at Houston Road, Houston. The site is effective and ready to be delivered within the lifetime of the plan. Also suggests a change of wording to Proposal P3, which is addressed under Issue 18.		
<u>Dr and Mrs Lyons (285)</u> Objection to the proposed development of land at Houston Road, Houston. Concerns raised about: drainage and sewage capacity; road capacity and safety; landscape character; impact on biodiversity; more suitable brownfield sites available; access to services and; school capacity.		
<u>Mr Angus Matheson (339), Cllr. Stuart Clark (437), Mr Brian McAllister (1448)</u> There is a lack of sewerage or school capacity to support this development proposal.		
<u>Mr Angus Matheson (339)</u> Development here would compromise the green belt policy as set out in New Development Supplementary Guidance (CD/09).		

Mrs. Mary Spalding (386)

Objection to any rezoning of the Greenbelt in Houston due to the lack of infrastructure and impact on the village.

Cllr. Stuart Clark (437), Cllr Allan Noon (2046)

Objection to green belt release while there are two brownfield sites available for development within the village.

Standard Letter (437, 493, 498, 514, 642, 656, 854, 954, 1026, 1028, 1042, 1047, 1209, 1212, 1213, 1214, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1246, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1308, 1309, 1310, 1311, 1312, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1349, 1350, 1351, 1353, 1354, 1355, 1356, 1357, 1358, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1381, 1382, 1383, 1386, 1387, 1390, 1392, 1393, 1397, 1398, 1399, 1400, 1402, 1403, 1406, 1408, 1410, 1412, 1414, 1415, 1420, 1421, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1431, 1434, 1437, 1441, 1442, 1443, 1444, 1445, 1446, 1448, 1449, 1450, 1451, 1452, 1453, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1480, 1481, 1482, 1483, 1484, 1485, 1487, 1488, 1489, 1490, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 1519, 1520, 1521, 1522, 1523, 1524, 1525, 1526, 1528, 1529, 1530, 1531, 1532, 1533, 1534, 1535, 1536, 1537, 1538, 1540, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1549, 1551, 1552, 1553, 1554, 1556, 1557, 1558, 1559, 1560, 1562, 1563, 1564, 1565, 1568, 1570, 1572, 1575, 1579, 1580, 1581, 1583, 1584, 1585, 1587, 1588, 1589, 1590, 1591, 1593, 1597, 1598, 1599, 1600, 1601, 1602, 1604, 1605, 1606, 1607, 1608, 1609, 1611, 1612, 1613, 1614, 1615, 1616, 1618, 1619, 1620, 1621, 1622, 1623, 1624, 1625, 1626, 1627, 1628, 1629, 1630, 1631, 1632, 1633, 1634, 1635, 1636, 1637, 1638, 1639, 1640, 1641, 1644, 1645, 1646, 1647, 1648, 1649, 1651, 1652, 1669, 1670, 1671, 1672, 1673, 1674, 1676, 1677, 1678, 1679, 1680, 1681, 1682, 1683, 1684, 1687, 1688, 1689, 1690, 1691, 1692, 1693, 1694, 1695, 1696, 1697, 1698, 1699, 1700, 1701, 1702, 1703, 1707, 1708, 1709, 1710, 1711, 1712, 1713, 1714, 1715, 1716, 1717, 1718, 1719, 1723, 1725, 1726, 1727, 1728, 1729, 1730, 1731, 1732, 1733, 1734, 1735, 1736, 1737, 1738, 1739, 1740, 1741, 1742, 1756, 1763, 1764, 1769, 1782, 1787, 1788, 2106)

Objection to the proposal for residential development at this site due to the site's specific character and its sensitive location. Allocation of this site is contrary to the Council's own site assessment and has been previously rejected in 2006. Development of this site would be incompatible with other provisions of the Local Development Plan and New Development Supplementary Guidance (CD/09) relating to development in the green belt. Concern is raised about, increased traffic and road safety; waterlogged nature of the site; impact on the character of the green belt and conservation area; distance to public

transport or retail facilities; impact on local amenities; impact on biodiversity; loss of a “green corridor”; loss of leisure amenity; the cost of implementing flood risk measures and prominence of the site. Some also state that, the site may be developed in ways that respect the character, environment and usage of the area, but residential development is not appropriate and that no reason has been given for the inclusion of this proposal to remove this area from the green belt and permit residential development.

Ms Gail Carvil (1425), Mr Chris Carvil (1446)

Not enough of the local community were made aware of the proposals therefore there has not been an adequate consultation process.

Ms Gillian Jamieson (1426)

The weight of public opinion is against this proposal.

Mr W Thomson (1808)

Objection to the development of this site. It is considered to not be effective: slope, flood risk, sewerage capacity and former mining/quarrying constraints are likely to present significant abnormal costs. It is also questionable whether a safe access can be achieved. Development would have a significant impact on the landscape, heritage and biodiversity. Detailed landscape assessment does not appear to have been carried out by the Council. Development would compromise the green belt boundary and would not be able to secure a further defensible boundary.

Mr A.R Nicol (1854)

The proposal represents a residential intrusion into the green belt which could lead to further development to the north, south and east of the site. The introduction of residential use would compromise the long standing character of the area which forms a rural entrance to the village and conservation area. Flooding issues on site mean it should not be released for residential use, detailed flood risk assessment is required. The site is not adjacent to the residential area, it is adjacent to a single house and separated from the residential area by a road and a green wedge. This site should be included within the green network. There was no indication of this greenfield release in the MIR, this contentious site should have been identified at least as an option prior to the Proposed Plan. Due to this contentious proposal, the consultation period should have been extended to 12 weeks.

Houston Community Council (2036)

Opposition to proposed developments in Houston, concerns raised about: School capacity; drainage and sewage capacity; impact on local public transport services; and increased traffic flow. It is also suggested that the proposals are against the Council’s own green belt policy.

David Wilson Homes West Scotland (2095)

Development of the site would not make a positive contribution to the place because it is set back from the existing neighbouring dwellings by two roads and a verge, amounting to 30m. It would be difficult to integrate into the settlement.

Modifications sought by those submitting representations:

Suggests a change of wording to Proposal P3, this is addressed under Issue 18. (158)

On page 30 of *Renfrewshire Local Development Proposed Plan 2013*, at “Schedule 2 – Additional Housing Sites – Greenfield”, delete in its entirety the item headed “Houston Road, Houston” with the additional information “10 units” and “Green belt release”. (339, 2100 and Standard Letter: 437, 493, 498, 514, 642, 656, 854, 954, 1026, 1028, 1042, 1047, 1209, 1212, 1213, 1214, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1246, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1308, 1309, 1310, 1311, 1312, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1349, 1350, 1351, 1353, 1354, 1355, 1356, 1357, 1358, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1381, 1382, 1383, 1386, 1387, 1390, 1392, 1393, 1397, 1398, 1399, 1400, 1402, 1403, 1406, 1408, 1410, 1412, 1414, 1415, 1420, 1421, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1431, 1434, 1437, 1441, 1442, 1443, 1444, 1445, 1446, 1448, 1449, 1450, 1451, 1452, 1453, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1480, 1481, 1482, 1483, 1484, 1485, 1487, 1488, 1489, 1490, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 1519, 1520, 1521, 1522, 1523, 1524, 1525, 1526, 1528, 1529, 1530, 1531, 1532, 1533, 1534, 1535, 1536, 1537, 1538, 1540, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1549, 1551, 1552, 1553, 1554, 1556, 1557, 1558, 1559, 1560, 1562, 1563, 1564, 1565, 1568, 1570, 1572, 1575, 1579, 1580, 1581, 1583, 1584, 1585, 1587, 1588, 1589, 1590, 1591, 1593, 1597, 1598, 1599, 1600, 1601, 1602, 1604, 1605, 1606, 1607, 1608, 1609, 1611, 1612, 1613, 1614, 1615, 1616, 1618, 1619, 1620, 1621, 1622, 1623, 1624, 1625, 1626, 1627, 1628, 1629, 1630, 1631, 1632, 1633, 1634, 1635, 1636, 1637, 1638, 1639, 1640, 1641, 1644, 1645, 1646, 1647, 1648, 1649, 1651, 1652, 1669, 1670, 1671, 1672, 1673, 1674, 1676, 1677, 1678, 1679, 1680, 1681, 1682, 1683, 1684, 1687, 1688, 1689, 1690, 1691, 1692, 1693, 1694, 1695, 1696, 1697, 1698, 1699, 1700, 1701, 1702, 1703, 1707, 1708, 1709, 1710, 1711, 1712, 1713, 1714, 1715, 1716, 1717, 1718, 1719, 1723, 1725, 1726, 1727, 1728, 1729, 1730, 1731, 1732, 1733, 1734, 1735, 1736, 1737, 1738, 1739, 1740, 1741, 1742, 1756, 1763, 1764, 1769, 1782, 1787, 1788, 2106)

Removal of the site from the housing land supply. (1808)

Greenfield releases in Houston should be removed from the plan, these should be added to the green network. (1854)

None suggested. (285, 386, 2046, 2036)

Summary of responses (including reasons) by planning authority:

Allocation of land for housing at Houston Road, Houston

In accordance with Scottish Planning Policy (SPP) (CD/03) and Planning Advice Note (PAN) 2/2010 (CD/42), Renfrewshire's Local Development Plan requires to indicate a generous and effective supply of land for housing. The figures set out in the Proposed Glasgow and the Clyde Valley Strategic Development Plan forecast in the Housing Need and Demand Assessment (CD/37) which were translated at a local level into the Housing Supply Targets set out in the draft Renfrewshire Local Housing Strategy 2011 – 2016 (CD/39) were taken to inform the Renfrewshire Local Development Plan Main Issues Report (CD/05). At the consultation stage of the Main Issues Report (MIR) (CD/05) in December 2011, the housing preferred strategy indicated that additional land would require to be identified to provide a generous and effective housing land supply. Brownfield and green belt sites were identified to meet the overall housing land requirement set at that time. Development at Houston Road, Houston was not then considered as necessary to meet this requirement. The site was however indicated within Housing Alternative Strategy 1. Since the consultation on the MIR and the production of the Proposed Renfrewshire Local Development Plan through 2012 there have been some changes, alterations and updates that required to be taken into account which has meant that more green belt land than indicated in the preferred strategy would be required to be identified to meet Renfrewshire's housing land requirements. The following changes/updates required to be considered in the production of the proposed LDP:

- The 2012 Housing Land Audit (CD/38) indicated a decrease in effective land supply, as in the current economic climate some sites would no longer be considered effective and deliverable within 5 years of the plan. This was agreed through discussion with Homes For Scotland;
- A decrease in the number of sites in the housing land supply which were considered as being no longer able to become effective within the plan period;
- In line with the average outputs of housebuilders, the programming for many large sites was decreased to a maximum 25 units per annum per housebuilder which meant substantial reduction in programming for Bishopton and Johnstone South West Community Growth Areas as well as Renfrew North sites;
- The housing supply targets in the finalised Renfrewshire Local Housing Strategy (CD/39) had increased in line with the final indicative all-tenure housing requirement as set out in the adopted Glasgow and the Clyde Valley Strategic Development Plan (CD/02), therefore the housing land requirements in the LDP required to increase; and,
- Providing a generous supply of land for housing was indicated at anything up to 20% above the housing supply target, this required to be identified in the proposed LDP.

Therefore as set out on Page 27 of the proposed LDP, there was a need to address a shortfall in the supply of land for housing from the sites identified to the Council through the Suggestions for Land Use Change and the MIR submissions, the Houston Road site was one of nine sites that was considered the most suitable locations for release for housing in terms of both planning and environmental considerations. The identification and provision of an effective and generous housing land supply is detailed further in Issue 17 and the identification of greenfield release sites is detailed in Issue 18.

Sites submitted for a change in land use allocation went through a fair, comprehensive and robust assessment process including a land use consideration planning sustainability assessment (CD/06), a strategic environmental assessment (CD/07), a landscape assessment (CD/08) and consultation on the Main Issues Report (CD/05) to assess the suitability of the site for development. The sites chosen for green belt release were identified to help deliver sustainable communities that are in places which offer a high quality of life with a wide range of existing assets. The suitability of the site is addressed further in response to the representations made with respect to the site.

Support (158)

The support for the allocation of this site is noted and welcomed.

Effectiveness of the Site (158, 1808, and Standard Letter)

The developer's statement that the site is effective and ready to be delivered in the lifetime of the plan is acknowledged and agreed. The council required that any sites submitted for consideration through the proposed LDP should be effective and deliverable within the lifetime of the plan. The proposed LDP states that developers will require to make good any infrastructure deficits associated with any new development, in terms of required infrastructure, facilities, services, traffic management measures and other requirements to support expanded communities and the scale and type of development proposed. This will ensure that the infrastructure, services and facilities will be provided to support this new development where required. It is the developer's responsibility to ensure that such costs have been taken into account prior to submitting the site to the council as effective.

Green belt Policy (339, 2036 and Standard Letter)

There has not been a requirement for the identification of green belt release in a Renfrewshire development plan for around 20 years. However as outlined above there is a requirement in this proposed LDP.

The area has been removed from the green belt in the proposed LDP, therefore any consideration of this site against the requirements set out in Policy ENV1 of the proposed LDP or under 'Acceptable forms of development in the green belt', 'green belt development criteria' or 'housing in the green belt' within the New Development Supplementary Guidance (CD/09) are not relevant. Nevertheless, the concerns arising from applying these policies have been addressed below.

In terms of green belt criteria, the wooded area to the south of the site and tree belt to the east are strong visual landscape features which would require to be retained and therefore continue to provide a clear defensible green belt boundary. Development of this site would therefore not compromise the integrity of the green belt and is unlikely to result in development spreading to surrounding fields. The development proposal for the site sets out enhancement of the wooded area to the south. By doing so the development would protect and improve the access to the green network, thereby performing another of the key role and function of the green belt.

Coalescence is not a concern at this site, this will not result by developing this site for residential use. Removal of this small area of green belt would not compromise the

identity of Houston as a settlement.

Landscape Character (285, 1808, 1854 and Standard Letter)

The Council commissioned a qualified landscape architect to assess all of the sites received through the Suggestions for Land Use Change consultation exercise. The results of this study have been published as a background paper (CD/08) to the Main Issues Report (MIR) (CD/05). This report informed the landscape assessment summary in the site assessment for this site. The study states that, “the majority of the site adds positively to the estate landscape character created by Houston House to the north, locally it creates an attractive setting for the historic residential properties to the north east and north west. Development along the Houston Road is not appropriate and could have a detrimental effect on the setting and character of the settlement and a negative effect locally.” The study however concludes that “the site could accommodate a small amount of appropriate development in certain areas as long as the setting and character of the settlement and green belt is not affected.” As such, while it is agreed that unsympathetic development could have a detrimental effect on the locally prominent landscape character of this site, it is rejected that any residential development necessarily would do so and an appropriate residential layout set in a comprehensive landscape scheme would contribute to the sense of place.

Any development proposal for this site would be required to meet the Places Development Criteria as set out in the New Development Supplementary Guidance (CD/09), and as such would be required to retain existing landscape features on the boundaries of the site which make a positive contribution to the character of the area. Specific concerns about the impact on the landscape would be assessed within the planning application process for this site.

Traffic/Access (285, 1808, 2036 and Standard Letter)

Development of any site is likely to result in increased traffic movements, however, it offers the opportunity for improvement to existing infrastructure. It is considered that the scale of this site is unlikely to have a significant impact on road and pedestrian safety. Further details of the position of the access and junctions as well as the internal road layout and parking associated with the development will be required to be provided at the detailed planning application stage. Again, given the scale of development, the impact on air quality, safety, parking and the condition of the roads will be limited. The developer will be required to design in suitable pedestrian access to connect into the existing residential area, as well as connections to services and facilities and open space.

Sewerage Capacity (285, 339, 437, 1448, 1808, 2036)

Scottish Water has agreed that it will work with developers to deliver sites which may require them to provide the necessary infrastructure or services, or a contribution towards its provision, in order to mitigate the impact of development. It is envisaged that any required mitigation works could be undertaken without having a detrimental impact on neighbouring properties. In line with proposed LDP policies and the New Development SG (CD/09), appropriate drainage and sewerage measures will be required to service the site. The developer confirms that this is an effective site capable of being developed in the plan period and should have already taken this factor into consideration.

School Capacity (285, 339, 437, 1448, 2036)

Capacity exists within existing primary and secondary schools.

Alternative Brownfield Sites in Houston (285, 437, 2046)

As detailed above, and under Issues 17 and 18, there is a requirement to provide a generous housing land supply which cannot be met by the established housing land supply, which already includes the two brownfield sites in Houston. Land in the green belt, across Renfrewshire has been allocated for new housing development. The site at Houston Road was identified as being effective as well as being of a scale which is able to be supported by existing infrastructure and would therefore have a limited impact. Other sites suggested for potential residential development in Houston are assessed under Issue 29.

Drainage and Flood Risk (Standard Letter and 285, 1808, 1854, 2036)

In its initial assessment of this site the council identified a potential surface water risk to the eastern corner of the site. A detailed Flood Risk Assessment is not however required for this site. In line with proposed LDP policies and the New Development SG (CD/09), appropriate drainage measures will be required to service the site. The developer confirms that this is an effective site capable of being developed in the plan period. It is expected that the developer will have taken into account any costs associated with drainage prior to submitting the proposal to the council.

Conservation Area (Standard Letter and 1854)

All development proposals within or in the vicinity of built heritage assets, such as the Houston Conservation Area, are required by Policy ENV3 of the proposed LDP to demonstrate that there is no negative impact on the site or setting of the heritage asset. The New Development SG (CD/09) also requires that “Proposals for development adjacent to a conservation area should not have a significant adverse affect on its architectural and historical character and wider setting.” Residential development at this site would require to comply with these policies, the specific detail of how this is to be achieved would be tested through the planning application process.

Local Amenities (285, 386, 2036 and Standard Letter)

It is considered that existing services and facilities could accommodate a development of this scale without significant impact. The development of this site is in accordance with current planning and transport strategy and policy. PAN 75 (CD/50) Planning For Transport suggests a maximum threshold of 1600m for walking is broadly in line with observed travel behaviour. The site is within walking distance of the nearest bus stop, playing fields/open space and local school and is also accessible to the village centre.

Biodiversity (Standard Letter and 285, 1808)

As a requirement of developing any of the green belt sites it will be necessary to provide a detailed study of the existing biodiversity, flora and fauna at the site. Biodiversity/flora/fauna issues associated with the development of this site were considered as part of the strategic environmental assessment (CD/07) which did not raise any significant issues. Any development proposal for this site will be assessed in line with the proposed LDP policies and the New Development SG (CD/09) ensuring biodiversity is

protected and enhanced.

Green Network (Standard Letter and 1854)

The council supports the provision of good quality green space, access opportunities and the integration and enhancement of blue and green networks. The proposed LDP and New Development SG (CD/09) support the protection of open space and recognise that new development often provides an opportunity to improve the existing resource or provide accessible, multifunctional open spaces. The site connects visually and physically with the settlement edge and its development would create an opportunity to improve access and improve links to the green network and open space.

Procedure (Standard Letter and 1425, 1446, 1854)

As detailed above within the section 'Allocation of Land for housing at Houston Road', it was considered that the provision of a generous housing land supply within Renfrewshire could be met from the established land supply with the inclusion of some additional brownfield and green belt releases. At the point of consulting on the Renfrewshire Main Issues Report (MIR) (CD/05), Houston Road was not required to meet the housing land requirements. The site was however included within Housing Alternative 1, which included a supply with 20% increase on the preferred strategy. The assertion that this site is a new site, not considered at the MIR is rejected. In line with Circular 1/09 (CD/51), the council identified this site as an option at the MIR stage. It must be remembered that the MIR is not a draft plan. Therefore there was access to review this proposal prior to the proposed LDP, the six week consultation period for consideration of this site within the proposed plan is considered to have been sufficient and compliant with legislation.

As indicated above, various changes have resulted in the need for the Renfrewshire Local Development Plan to identify additional green belt release to that indicated in the MIR Preferred Strategy to provide, in accordance with Scottish Planning Policy (CD/03), an effective and generous housing land supply. The assertion that no reason is given for the inclusion of this proposal is also rejected. This is explained and set out in the Places section of the proposed LDP.

In accordance with the development planning regulations, the owners, lessees or occupiers of all properties within 20 metres of the proposal site were directly notified, by letter, of the proposal. All respondents to the MIR consultation were also directly notified by email or letter, as were persons who had specifically requested to be placed on the Local Plan consultation mailing list. Furthermore, an advert was prepared and was published in the Paisley Daily Express and the Renfrewshire Gazette 9 January 2013 and 16 January 2013. The advert was also placed on the Tell Me Scotland website. This website is a portal for accessing public information notices issued by local authorities across Scotland and provided links to the council's web site. News stories were also placed on the front page of the council website for the duration of the consultation period, with details and all documents available to view on the Development Planning pages of the council website. Hard copies of all documents were deposited at local libraries and were also available for inspection at the Council offices. All Community Councils and Elected Members across Renfrewshire were also sent copies of the plan. As a result there have been 1779 respondents, to the proposed LDP consultation, with 454 made regarding this site alone. It is therefore rejected that consultation process has been insufficient.

Integration with the settlement (1854, 2095)

The amenity grassland at Manse Crescent and adjacent lane are part of the settlement as indicated on the Proposals Maps for both the proposed LDP and the 2006 Local Plan. The site lies adjacent to these and therefore can be considered to adjoin the settlement. By achieving an access onto the main Houston Road, the site has a visual relationship with it. This relationship to the main road is a feature shared with existing residences along Houston Road. Furthermore, the design and layout of the site will require to ensure that there is good footpath connection to the existing residential area and the green network. The site is not isolated from the existing settlement and is considered to integrate with the current built up area.

Conclusion

In conclusion this site emerged as a desirable option because there are relatively few planning and environmental constraints and its scale means that those that do exist can be dealt with and resolved. The scale of the development also means that there would be no requirement additional public transport infrastructure, the services and facilities in the village centre and schools could accommodate the development without significant impact and other requirements such as water and roads infrastructure can be dealt with by the developer as it would do with any other such housing development. Although this allocation will result in the loss of greenfield land, given the requirement to provide sufficient effective land to meet the housing land requirement and the extensive site assessment carried out by the council, the location and scale can be justified.

Reporter's conclusions:

Allocation of site

1. As stated in the conclusions in the report on Issue 17, the proposed plan does not identify sufficient land on a range of sites which are effective or capable of becoming effective to meet the housing land requirement up to year 10 from adoption, ensuring a minimum of 5 years effective land supply at all times as required by SPP. The presumption in SPP is that development will be directed towards sites in existing settlements where possible to make effective use of existing infrastructure. Brownfield sites are preferred to greenfield sites and this is a particular focus of the proposed plan. Two brownfield sites in Houston have been identified in Schedule 3 of the local plan as part of the effective land supply. In Renfrewshire however, brownfield and other urban land which is suitable for residential development will not meet the housing need and demand, nor would it provide the generous and effective housing land supply required by SPP. Some greenfield land will be required to maintain a supply of effective land.

2. In 2012 the council undertook a strategic review of the Renfrewshire green belt (CD49) as part of the preparation for the plan. That review recognised that a limited release of green belt land was not essential, in terms of the quantity of future development land required during the life time of the plan, but desirable to provide increased range, choice and generosity of development sites, providing the flexibility as indicated by the Scottish Government. Taking into account the SDP's optimistic growth and demographic scenario, the review selected a small number of locations for release from the green belt, for development. The selected green belt release sites are at a scale that can be supported by existing infrastructure.

3. The review indicated that the green belt sector in which this site is situated has areas of strengths and weaknesses. There is potential opportunity in the sector for small scale development, limited to discrete sites, but these sites would require good design, layout, enhanced landscaping and provide opportunities to enhance the green network. The review has found this site to be acceptable for release from the green belt with no or minimal constraints, and capable of development in the next 5 years.

Support for development

4. The support expressed by Park Lane is not an unresolved representation and does not require to be considered as part of the local plan examination.

Effectiveness of development

5. The developer has provided sufficient information to the council to confirm that the site is effective within the lifetime of the plan. The council's green belt review (CD49) found this site to be acceptable for release from the green belt with no or minimal constraints, and capable of development in the next 5 years. I have noted the representations regarding various constraints that it is submitted would mitigate against the effectiveness of the site, including flooding, drainage, stability, and other infrastructure matters but have seen no compelling evidence to support these representations. I am not persuaded therefore that the site would not be effective.

Green Belt policy

6. The site comprises an irregular shaped, fairly flat, area of unmaintained derelict grassland with areas of scrubby vegetation. A line of poplar trees in a diagonal line is located in the eastern area of the site. The site is bounded to the north by scrub vegetation along the side of Houston Road with mature woodland beyond. Mature woodland to the south and east provide strong containment and a robust, defensible green belt boundary. Just beyond the eastern and north western boundaries of the site lie large detached dwellings. The boundary to the south west is formed by a stone wall, overgrown with vegetation and the occasional established tree creating some containment. Next to that boundary lies a narrow road that turns into a walkway and to the west lies a small area of amenity grassland and the built up area of the settlement.

7. As already stated, the council's green belt review (CD49) found this site to be acceptable for release from the green belt with no or minimal constraints, and capable of development in the next 5 years. The council has assessed the various sites put forward in an open and transparent manner. I see nothing to suggest that the approach of the council in identifying this site for residential development has been inappropriate or in some way flawed. Since the site has been removed from the green belt in the local development plan and allocated for housing it would not be appropriate to assess any development proposal against green belt development criteria contained in the plan.

Landscape character

8. Based on my observations of the site and surrounding area I see no reason to disagree with the Landscape Assessment Summary contained in CD06 which states *"The site could accommodate some development to the south. The majority of the site adds positively to the estate landscape character created by Houston House to the north, locally it creates an attractive setting for the historic residential properties to the north east"*

and north west. Development along the Houston Road is not appropriate and could have a detrimental effect on the setting and character of the settlement and a negative effect locally. Site is sensitive but could accommodate a degree of appropriate development in small areas of the site."

9. Any development would obviously have a local impact. However only 10 houses are proposed for this site and any development would require to comply with the council's New Development Supplementary Guidance (CD09). That guidance provides that *"Where considered necessary by the Council, areas of public and private open space will be retained where they are of recreational or amenity value. Existing landscape and ecological features will also be retained where they make a positive contribution to the character of the area."* As stated in paragraph 6 above, there is mature woodland on the east side of the site and to the north of Houston Road which provides strong containment and a robust, defensible green belt boundary. That woodland also serves to separate the site from the dwellings to the east and north. In view of the foregoing, and for the reasons set out in paragraphs 6-8 above I am satisfied that, provided there is good design and landscaping incorporated into the site layout, appropriate residential development could be accommodated on this site without adversely affecting the setting of the listed building to the east or Houston House to the north and without significant detriment to the wider landscape.

Traffic/access

10. I accept that development of the site would result in an increase in car journeys but only 10 houses are proposed. I have also noted the comments of the council's Roads Department in CD06 that given the size of the site, access onto the road is unlikely to have significant traffic and transportation issues. Further details in relation to the potential junction location would be required. That can be done at the stage of a planning application and should address any road safety/capacity concerns. The council has also confirmed that the developer would be required to design in suitable pedestrian access to connect into the existing residential area, as well as connections to services and facilities and open space. In view of the foregoing, I find that any issues associated with traffic/access are unlikely to present this proposal with significant difficulty.

Sewerage capacity

11. I have seen no compelling evidence to persuade me that sewerage constraints will prevent development of the site. I note that Scottish Water has agreed to work with developers to deliver sites and the developer has already confirmed that the site is effective within the plan period. In any event, at the planning application stage, the developer will require to demonstrate the provision of adequate drainage infrastructure.

School capacity

12. The council has confirmed that capacity exists within existing primary and secondary schools and I have seen no compelling evidence to the contrary.

Alternative brownfield sites

13. As stated in paragraph 1 above, the plan makes clear that brownfield sites are preferred to greenfield sites for development. In Renfrewshire however, brownfield and other urban land which is suitable for residential development will not meet the housing

need and demand, nor would it provide the generous and effective housing land supply required by SPP. Some greenfield land will be required therefore to maintain a supply of effective land. The council's green belt review (CD49) found this site to be acceptable for release from the green belt with no or minimal constraints, and capable of development in the next 5 years.

Drainage and flood risk

14. I note that the council's assessment of the site summarised in CD06 states that there is a surface water risk to the eastern corner of the site, possibly to a depth of around 1.0 metre and that attenuation measures are likely in order to provide betterment to the site's drainage system. Any development on the site would require to be preceded by an application for planning permission and the plan provides that all developments must be assessed against the plan policies and the guidance/criteria within the New Development Supplementary Guidance (CD09). The guidance provides that development proposals should comply with the principles of sustainable flood risk management and the council would require to be satisfied that appropriate drainage measures were in place.

Impact on Conservation Area

15. As already stated, any development on the site would require to be preceded by an application for planning permission. Policy ENV3 of the plan provides that a development proposal within or in the vicinity of a conservation area will be required to demonstrate that there is no negative impact thereon and will accord with the New Development Supplementary Guidance.

Local amenities

16. CD06 also shows that there is no difficulty with accessibility to public transport, the settlement centre, local services and green network on foot. Based on my observations at the site and in the surrounding area I do not disagree with that assessment.

Biodiversity

17. The council's overall strategic environmental assessment of the site summarised in CD06 states that SEA issues are limited to the impact that development of this site would have on the amount of car journeys resulting in an impact on air quality. There is no mention of unacceptable impact upon biodiversity/flora/fauna. For the same reasons set out in my conclusions in Issue 23 (paragraph 10), I am satisfied that there are sufficient safeguards in place to deal with issues that may affect any species, habitats and ecosystems on this site.

Green network

18. There is no evidence of a shortage of open space in and around Houston even taking into account the proposed housing allocations. Only 10 houses are proposed for this site and any development would require to comply with the council's supplementary guidance which provides that where considered necessary by the council, areas of public and private open space will be retained where they are of recreational or amenity value. The council has also confirmed that the developer would be required to design in suitable pedestrian access to connect into the existing residential area, as well as connections to

services and facilities and open space. For the reasons set out above it is appropriate for this site to be removed from the green belt and allocated for housing.

Procedure

19. As stated in my conclusions in relation to Issues 22 and 23, our examination of conformity with the participation statement has concluded that the council has consulted on the plan and involved the public at least in a way it said it would in its participation statement.

Integration with settlement

20. Adjoining the narrow road to the west of the site lies a small area of amenity grassland and the built up area of the settlement. The Proposals Map shows that the amenity area is part of the settlement. Based on my observations at the site and the neighbouring area I am satisfied that the site can be described as adjoining the settlement. The council has confirmed that the developer would be required to design in suitable pedestrian access to connect into the existing residential area, as well as connections to services and facilities and open space. I am satisfied therefore that that careful development would integrate well with the existing settlement and would not constitute an unreasonable extension into the green belt.

Reporter's recommendations:

No modifications.

Appendix 1: Body or person(s) submitting a representation raising the issue (including reference number):	
STANDARD LETTER	Robert Hadden (1471)
Angela Edmiston (493)	Mr Alex Nicol (1472)
Allyson Ross (498)	Ethel Hadden (1473)
Mr Stephen Darroch (514)	Ann Strawbridge (1474)
W. Mitchell (642)	Ms Doreen Anderson (1475)
Robin Chisholm (656)	Mr H.M. Anderson (1476)
Kate Pinkerton (854)	Colin Berry (1477)
Sandra Jordan (954)	Ms Laura Jane Lawson (1478)
Robert Anderson (1026)	M Campbell (1480)
Diane Rotherforth (1028)	Campbell Mills (1481)
Robert Ross (1042)	M.A. Quinn (1482)
Mr Alan McLaughlin (1047)	Neil Yeaman (1483)
H.J.C. Tulloch (1209)	Anne Wood (1484)
Margo Evans (1212)	Mr A Anderson (1485)
Olive Tulloch (1213)	William Kirkwood (1487)
Nicola Capper (1214)	Andrina Kirkwood (1488)
Neil Holmes (1216)	Lesley Hart (1489)
Kenneth Hepburn (1217)	Ms Elspeth Dawson (1490)
Joe McCabe (1218)	Mrs M Rodger (1491)
Andrew Chisholm (1219)	Ms Claire Boyd (1492)
Mrs Iris Simmet (1220)	Ms Cheryl Stewart (1493)
Pamela Chisholm (1221)	Ms Deborah Fadian (1494)
Mr Daniel Gill (1222)	Ms Julie Docherty (1495)
Catherine Smith (1223)	Michael Poole (1496)
Jennifer Rankin (1224)	Ms Gillian Graham (1497)
M Winters (1225)	Ms Laura Smillie (1498)
Martin Finn (1226)	Ms Liz Balfour (1499)
Mrs S Hunter (1227)	Ms Hazel O'hare (1500)
M Ferguson (1228)	Ms Clare Smith (1501)
Thomas Smith (1229)	Layla Forbes (1502)
Andrew Lightbody (1230)	Ms Alexis Harvey (1503)
James Campbell (1231)	Mr Jamie McNicol (1504)
Alan Vaughan (1232)	Ms Janice Stirling (1505)
Ann Campbell (1233)	Ms Annie Johnston (1506)
Alex Baird (1234)	Mr Thomas Langley (1507)
Anne Baird (1235)	Mr Sandy McIntosh (1508)
Norma McBeath (1236)	Iain Cameron (1509)
James McBeath (1237)	K Margery (1510)
Kenneth Rawson (1238)	William Watt (1511)
Sharon James (1239)	Ms Margaret Macleod (1512)
Heather Fiskien (1240)	Elizabeth Lightbody (1513)
Howard Enos (1241)	Miss Jean Aitken (1514)
A McNeil (1242)	Mary Clayton (1515)
Jennifer Henderson (1243)	Elizabeth McPhee (1516)
Barbara Morrison (1244)	Mrs M Griffin (1517)
Anne Thomson (1246)	Jayne Kyle (1518)
Kenneth Campbell (1248)	Ms Jean Mills (1519)
	Elizabeth Thomson (1520)

Fiona Morrison (1249)	Eddie O'Neill (1521)
Margaret Moncrieff (1250)	John Gray (1522)
Mary Fanning (1251)	Eileen Crocket (1523)
James Collins (1252)	Jackie Whyte (1524)
Kay Farley (1253)	Ms Helen Teese (1525)
Margaret Carruth (1254)	Margaret Jeffrey (1526)
Michael McCulloch (1255)	Mr Colin McLArnon (1528)
Susan Greig (1256)	Gary Fay (1529)
Angus Mackay (1257)	Catriona Connelly (1530)
P Mackay (1258)	Mr D Holdbrook (1531)
Bennet Smith (1259)	Ms Lisa Paton (1532)
Alexandra Donaldson (1260)	Tom Rowan (1533)
Doreen McGowan (1261)	Ms Joanne Thompson (1534)
Ms Louise Welsh (1262)	Scott Russell (1535)
Sandra MacPherson (1263)	Ms Shiela Cossar (1536)
Ms Margaret Gill (1264)	Fiona Robinson (1537)
Ms Tracy McQuillan (1265)	Irene Aitken (1538)
Mr Donald Laurie (1266)	Ms Angela Gribben (1540)
Ms Janet Donaldson (1267)	Marjorie Wilson (1541)
Mrs G Ham (1268)	Rev. Robert Chambers (1542)
Mr Craig Duncan (1269)	Ms Lorna Nelson (1543)
Mr David Duncan (1270)	Vincent Ivanski (1544)
Mrs Alexanderina Duncan (1271)	Elaine Hunter (1545)
Ms Cheryl Clark (1272)	Carolynne Kinnon (1546)
Ms Arlene Morrison (1273)	Nicola Steele (1547)
Tina Hay (1274)	Eilleen Kennedy (1549)
Mr Stephen Vosloo (1275)	Sally Hepburn (1551)
Jonathon Hay (1276)	M Simpson (1552)
Ms Tracey McDonald (1277)	Joy Chisolm (1553)
Ms Fiona Murray (1278)	Francis Kinloch (1554)
Vivienne Ross (1279)	Mr Charles Simpson (1556)
Ms Fiona Nuttall (1280)	Elaine Rowan (1557)
Ann Nimmo (1281)	C. Kane (1558)
Ms Wilma Keenan (1282)	Anne McKendrick (1559)
Mr Sean Gray (1283)	Ms Moira Heyes (1560)
Lisa Lavery (1284)	Jenni Mason (1562)
Mr Matthew Alexander (1285)	G Hannah (1563)
Alan Gilmour (1286)	Ms Lesley Finn (1564)
Ms Evie Anderson (1287)	Mr Boyd (1565)
Ms Louise Wilson (1289)	Mr Robert Gould (1568)
Lynne Fraser (1290)	Mr James Caldwell (1570)
Mrs E Kyle (1291)	Fiona Rodgers (1572)
M English (1292)	Kristen Andrews (1575)
Mr Paul Houston (1293)	Laura Hams (1579)
Mrs S Gilks (1294)	Keith Barlow (1580)
Ms Nicola McAllister (1295)	Margaret Carvil (1581)
B Holmes (1296)	Desmond McCulloch (1583)
Ms Marie Walker (1297)	John Carvil (1584)
Ms Gillian McFarlane (1298)	Ms Fiona Caldwell (1585)
Steven Davison (1299)	John McKenzie (1587)
Ms Gillian Peters (1300)	Ms Michelle Clark (1588)
Ms Fiona Kerr (1301)	Fraser Ballantyne (1589)

Ms Aileen Graham (1302)	Florence Galloway (1590)
Carole Finnie (1303)	Ms Lisa Watson (1591)
. Ford (1304)	Nicki Barrett (1593)
Dawn Kyne (1305)	Mrs. Marion Nicol (1597)
Frank Holt (1306)	Ms Valerie Paterson (1598)
Mrs Joan Spearing (1308)	Mr Richard Taylor (1599)
Mr Alan Calderwood (1309)	Christine Lawson (1600)
Brian Harvey (1310)	Ms Lorna Kinloch (1601)
Ms Sharon Larkin (1311)	Ms Kerry Roberts (1602)
Ms Fiona Christie (1312)	Ms Linda Basler (1604)
Mrs P. McCallum (1314)	Isobel Gallagher (1605)
Ms Ann Frew (1315)	Gordon Galloway (1606)
F. Cameron (1316)	Mr MacGeadie (1607)
Gordon Kyle (1317)	Mrs MacGeadie (1608)
Ms Karen Heyes (1318)	Nigel Jameson (1609)
Mr Alan Stevenson (1319)	Alexandra Spearing (1611)
Ms Carly Heyes (1320)	Ms Helen Smith (1612)
Barry Sillers (1321)	Shelagh Russell (1613)
Ms Deborah Summerhill (1322)	Karen Wilson (1614)
Ms Susan Orr (1323)	Ms Marianne Boland (1615)
Martin Abel (1324)	Lorna Torrens (1616)
Ms Karen Telfer (1325)	John McEwan (1618)
Mr Kenneth Mackinnon (1326)	Kim Rotherforth (1619)
Margaret McCabe (1327)	Mrs. Susan Milliken (1620)
Ms Beth Morris (1328)	Samantha Stark (1621)
Derek Loughlin (1329)	Forrest Cunningham (1622)
Mr Ham (1330)	Margaret Clarkson (1623)
Mr Alan Linton (1331)	Sharon Barlow (1624)
Ann Grieve (1332)	Ms Louisa Corlett (1625)
Marie Richardson (1333)	Katherine Johnson (1626)
Mr Craig Pollock (1334)	Mr. and Mrs. N. Clark (1627)
Rachael Hassan (1335)	Phyllis Clark (1628)
Ms Irene Sandham (1336)	Mr. and Mrs. Black (1629)
S Ballantyne (1337)	Jenny Dickson (1630)
Margaret Beattie (1338)	E Kinney (1631)
Ms Sabine Burkart (1339)	Angela Paterson (1632)
D. Hart (1341)	Pamela Redpath (1633)
Ms Fiona Gaffney (1342)	Laura Cook (1634)
Leanne Kelly (1343)	Mrs M. Thomson (1635)
Ms Paula Galloway (1344)	David Furniss (1636)
Norma Manwell (1345)	David Gillanders (1637)
Ms Tracy Ferguson (1346)	Elaine Mills (1638)
Ms Shirley Gibb (1347)	F Shaw (1639)
Ray Williamson (1349)	Jane Corr (1640)
Ms Linda Smith (1350)	Carol Ann Ronald (1641)
Ms Gail Shand (1351)	Graham Peters (1644)
Alison Page (1353)	Aisha Davidson (1645)
Ms Catrina Houston (1354)	Victoria Clark (1646)
Ann Nicolson (1355)	Elita Storey (1647)
Julie McCallum (1356)	Maura Lynch (1648)
Greg Lilley (1357)	Elaine Rawson (1649)
Mr Steve Bowden (1358)	Fiona Murray (1651)

Ms Gillian Hill (1360)	Liz Quinn (1652)
William Milligan (1361)	Susanne Gray (1669)
Ms Allyson Campbell (1362)	Ross Donaghy (1670)
Ms Sharon Glasgow (1363)	Elizabeth McGhee (1671)
Mr Jason Barrett (1364)	David Donaldson (1672)
W. Rowan (1365)	Julie Reid (1673)
Mr Gordon Bradford (1366)	Peter Richardson (1674)
Lyndsey McNab (1367)	Joanne Furniss (1676)
Ms Jennifer Baker (1368)	Clair Barclay (1677)
Sarah McKie (1369)	Sheila Buchanan (1678)
Ms Adeline Burns (1370)	Charlotte Taylor (1679)
Mrs Alison Ritchie (1372)	M Gilmour (1680)
June Borland (1373)	John McFarlane (1681)
Ms Isobel Stewart (1374)	Linda Anderson (1682)
Ms Tracy Graham (1375)	Margaret Chambers (1683)
Ms Katrina Little (1376)	Ann Marie Gilroy (1684)
Ms Julie Whaley (1377)	J McNeil (1687)
Angela McMaster (1378)	Neil Sullivan (1688)
Barbara Snodgrass (1379)	Grant Cadden (1689)
Brian McNab (1381)	A Anderson (1690)
Kathleen Jones (1382)	Ann Forsyth (1691)
Karen Carmichael (1383)	A Cameron (1692)
Mike Rotherforth (1386)	Bernice Scott (1693)
Karen Craig (1387)	Elizabeth Lawrie (1694)
A.W. Scott (1390)	Paul Rutherford (1695)
Leigh Munro (1392)	Ms Fiona Martin (1696)
Derek Whittle (1393)	C. Keddie (1697)
Ms Kathleen Campbell (1397)	J. Bright (1698)
Ms Anna Ross (1398)	Ms Lynda McLeod (1699)
Janet Mason (1399)	Suzanne Bennion (1700)
Miss A M Cairns (1400)	Ms Julie Devine (1701)
Ms Laura Forbes (1402)	Mr David Jagger (1702)
Dr Kirsty Horne (1403)	Ms Arlene McKay (1703)
Ms Kathy McFall (1406)	Ms Maria Oto (1707)
Mr Clive Henderson (1408)	Ms Jean Allan (1708)
C Morrison (1410)	Ms Elizabeth Donaldson (1709)
Mr James Jamieson (1412)	Ms Moira Dunlop (1710)
Gwen McKerrell (1414)	Mr Jack McKechnie (1711)
Mr Ray Evans-Nixon (1415)	Lindsay McLarren (1712)
Mr Ian Griffiths (1420)	Euan Allison (1713)
Mr Roger S. Calvert (1421)	N. Sneddon (1714)
Mr J.S Mclay (1423)	Eileen Parsons (1715)
J Taylor (1424)	Deane Hull (1716)
Ms Gail Carvil (1425)	Anne Evans (1717)
Ms Gillian Jamieson (1426)	Ms Lisa Cliff (1718)
Ms Isobel McNeil (1427)	Ms Libby Duncan (1719)
Garry Turkington (1428)	Mr Philip Teese (1723)
Stuart Morrison (1429)	Ms Barbara Fraser (1725)
Sandra Brown (1431)	Kathleen Oliver (1726)
Carol McLeod (1434)	William Woods (1727)
Joanna Horner (1437)	Ms Sharon Ingram (1728)
Mr William I Jefferson (1441)	Craig Hunter (1729)

<p>Joan Kyle (1442) Clemency Webb (1443) Mrs E Johnstone (1444) M Howe (1445) Mr Chris Carvil (1446) Mr Brian McAllister (1448) Colin Wade (1449) James McGhee (1450) Ms Alyson Craig (1451) Mary Chambers (1452) Ms Beth MacLeod (1453) Carole Cameron (1455) Mr Anthony Forbes (1456) Robert Sullivan (1457) Jennifer Cowan (1458) Margaret Barr (1459) W.J. Strawbridge (1460) Mrs C Wishart (1461) Mr Allan Black (1462) J MacLeod (1463) Morag Sinclair (1464) Robbie Wishart (1465) Ms Christine McCann (1466) Ms Christine Gibb Stuart (1467) Ms Marion Hay (1468) Andy Wishart (1469) Ms Agnes Holmes (1470)</p>	<p>Robert Barr (1730) R.A. McGregor (1731) Donna Easton (1732) Margaret Stevenson (1733) Lesley Evangelista (1734) Ms Eileen Black (1735) Mr Connor McLean (1736) Dr William Manley (1737) Ms Moira Mckinnon (1738) Mr Leslie Forbes (1739) Lennox Webb (1740) Ms Julia Chandler (1741) Stephen Wright (1742) Mrs Julie Anne Gibb (1756) Linda Smith (1763) Niall MacLeod (1764) Russell Gibb (1769) Sherry Burns (1782) Mr Alan McPherson (1787) Mr Duncan Webb (1788) Robert Holmes (2106)</p>
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Issue 25	Bishopton – Alternative Suggested Housing Sites	
Development plan reference:	None	Reporter: Dannie Onn
Body or person(s) submitting a representation raising the issue (including reference number):		
Casa Planning & Environment Ltd (451) John Reid (340) Scottish Water (154) Cala Homes (West) (2114)		
Provision of the development plan to which the issue relates:	Alternative suggested housing site on Green Belt land at Bishopton.	
Planning authority's summary of the representation(s):		
<u>Casa Planning & Environment Ltd (451)</u> Object to the exclusion of site at Station Road, Bishopton (Ref. 2289/2201) for potential development for housing. <u>John Reid (340)</u> The development of the former Royal Ordnance Factory site and its access solutions are not now a constraint to the development of the Station Road site. A new site access can be achieved by demolition of adjacent properties. Due to the proximity to the railway station and local facilities, the site is a highly sustainable option for housing development and would improve housing choice. Given the need for land and the general suitability of the site for residential development, the council could have approached the owner to clarify the current position given his previous involvement and efforts. <u>Scottish Water (154)</u> The site's former infrastructure use has ceased and it is now brownfield. The site makes no contribution to the Green Belt and it should be re-allocated for housing development. Redeveloping it for housing would be wholly compatible with the surrounding uses and regeneration accords with the LDP's Spatial Strategy. The site is a sustainable development which is centrally located and is accessible for public transport. The former Royal Ordnance Factory site will take a considerable time to deliver housing, whereas this site can make an effective contribution to the immediate supply of available land. <u>Cala Homes (West) (2114)</u> The site is an infill site and it is sustainable and effective, being under the control of CALA Homes (West), and it can provide around 50 new homes, based on sales of up to 25 homes per annum, assisting the Council's strategic housing requirement. The site can be developed within a landscape framework supportive of the Council's green network		

objectives. The scale and proximity of the site, to the former Royal Ordnance Factory site, will not detrimentally affect the delivery of the Bishopton Community Growth Area which has a 20 year development timescale. The lack of a direct frontage does not preclude the site's development.

The Council's site assessment does not take account of the submission made to the Main Issues Report regarding the land use proposal for this site. No methodology has been prepared by the Council to explain how the site rankings have been awarded or how they have been used to inform the development strategy.

Modifications sought by those submitting representations:

Site at Station Road, Bishopton be included in the LDP as a preferred location for a mixed use residential high density development. (451)

Allocate site at Station Road, Bishopton for housing development. (340)

Amend the Proposals Map to exclude the site at Station Road, Bishopton from the Green Belt. (154)

Amend Schedule 1 to include:

'Former Scottish Water Works and adjoining land, Station Road, Bishopton (50 units) – Redevelopment Opportunity'. (154)

Amend the Green Belt boundary and allocate the site at Station Road, Bishopton for residential development in Schedule 1. (2114)

Summary of responses (including reasons) by planning authority:

Proposed additional housing site (2114, 154, 340, 451)

The council agree that the site is sustainable and development would constitute the infilling of land at the south of the settlement. It is recognised that development of this site would not make the remaining green belt boundary less defensible, given the strong edge created by the existing fields south of the site. However, in terms of the overall proposed LDP spatial strategy, it is the intention to provide a range and choice of sites across Renfrewshire. The Community Growth Area (CGA) re-development at the Royal Ordnance Factory, Bishopton will provide a number of houses adding to the range and choice of residential units over the next 20 years. There is simply no requirement to identify the additional green belt site in Bishopton, particularly when there is so much land immediately available, effective and deliverable at the former Royal Ordnance Factory site. Given its scale, the development would not, on its own, have a significant impact on education provision.

In relation to the location of this alternative housing site, it is difficult for any units to have a positive, cohesive relationship with the settlement. The site has limited frontage and would contribute very little to the sense of place. Development of the site will potentially incur costs for the removal of existing infrastructure.

The independent landscape assessment report (CD/08) (by Ironside Farrar), prepared to inform the LDP Main Issues Report, rated a part of this site as '3' which equates to 'areas of the site are sensitive and should be retained, mitigation measures are required to

maintain the character of the settlement / Green Belt'. Other parts were rated as '4' and were considered suitable for development, although 'attention to design and retention of site features is necessary'.

In conclusion, the council continues the support of the spatial strategy in the proposed LDP and does not consider the site, at Station Road, as suitable for development. We therefore recommend that the Station Road site is not re-zoned for residential use, and that it remain zoned as green belt.

Reporter's conclusions:

1. As stated in the conclusions in the report on Issue 17, the proposed plan does not identify sufficient land on a range of sites which are effective or capable of becoming effective to meet the housing land requirement up to year 10 from adoption, ensuring a minimum of 5 years effective land supply at all times. The council will therefore need to identify further sites by a review of housing land supply. I have assessed the site under this issue on its individual merits.
2. The strategy for the proposed plan is to focus development on brownfield sites in preference to greenfield. However, the brownfield and other urban land suitable for residential development will not meet the housing need and demand, nor would it provide the generous and effective housing land supply required by SPP. Some greenfield land will be required to maintain an effective supply.
3. The site at Station Road, Bishopton is in the designated green belt. It is, however in a sustainable location and, with an indicative capacity of 50 units, is at a scale which could make an early contribution to housing delivery. It is a discrete area of land which would appear as infill. It would round off the residential development on this side of Bishopton and leave the boundary of the green belt in a logical and clearly defined position. The western boundary of the site is well-defined and the council agrees that development of this site would not make the remaining green belt boundary less defensible. Further, the character of the site is markedly different from the adjoining farmland, being redundant water infrastructure site in part and with an old nursery use towards Station Road.
4. I do not consider that a housing site on this scale would make a significant difference to the Community Growth Area on the former Royal Ordnance Factory site nearby. No significant infrastructure issues are raised.
5. The site has no ready road access and there is existing water supply infrastructure on it. These constraints would need to be overcome before housing could be delivered. With careful design (in accordance with the implementation of the spatial strategy on page 6 of the proposed plan and the New Development Supplementary Guidance) the solution to the access problem could result in a development well integrated with the rest of the settlement. This site could become effective in the first 5 years of the proposed plan and make a valuable contribution to the housing land shortfall. I consider that it should be included in the additional housing sites allocation.

Reporter's recommendations:

Add the site at Station Road, Bishopton to Schedule 2 of the proposed plan as a green belt release and with an indicative capacity of 50 units.

Issue 26	Bridge of Weir – Alternative Suggested Housing Sites	
Development plan reference:	None	Reporter: Ron Jackson
Body or person(s) submitting a representation raising the issue (including reference number):		
Ranfurly Castle Golf Club (16) Andrew Forrest Properties (85) Old Course Ranfurly Golf Club (146) Michael Hopcroft (344) Ranfurly Estate (1980) Paterson Partners (2003)	CH Bull & Sons (2038) Bridge of Weir Community Council (2065) ALEFTAV LTD (2072) David Wilson Homes (2095) CALA Homes (West) (2114)	
Provision of the development plan to which the issue relates:	Alternative suggested housing sites on green belt land around Bridge of Weir including Clevans Road, Ranfurly Castle Golf Club, CH Bull Garage Site, Kilmalcolm Road, land to the south of Kilmalcolm Road & Strathgryffe Crescent, Kilbarchan Road, Lawmarnock Road and Whitelint Gate.	
Planning authority's summary of the representation(s):		
<p>General Strategy</p> <p><u>Michael Hopcroft (344)</u></p> <p>Strongly urge for a moratorium to be introduced on any further housing development in the Bridge of Weir area until improvement works are carried out on the road infrastructure at the Deafhillock roundabout and the B739/A737 junction by Johnstone.</p> <p>Clevans Road (Site: 2241)</p> <p><u>Ranfurly Estate (1980)</u></p> <p>Promote the 0.4ha site to be allocated as a housing site for one single dwelling. There are few constraints to the development. The site is directly adjacent to existing housing and is capable of being developed as a logical small-scale extension to the settlement. There is an existing building on the site in disrepair, therefore the site is not greenfield. The site is within single ownership, no constraints to delivery, therefore viable and deliverable within the LDP period.</p> <p>Ranfurly Castle Golf Club – Clevans Road (Site: 2247)</p> <p><u>Ranfurly Castle Golf Club (16)</u></p> <p>Promote a small effective site with limited constraints, on the edge of the settlement, addressing demand at the top end of the housing market, for which there is no obvious provision in the LDP or wider locality. The site has seen historical development, is</p>		

considered part brownfield and is surplus to the requirements of the golf course. Five individual plots could be delivered as soon as possible to fund improvements to the existing golf clubhouse to secure its future.

CH Bull Garage Site, Kilmalcolm Road (Site: 5015)

CH Bull & Sons (2038)

Request that the site be identified as an opportunity for redevelopment with the preferred uses identified as housing and/or convenience retail. The owners are at an advanced stage in negotiations with a potential housebuilder with a view to bringing forward detailed redevelopment proposals in early course. The LDP proposals map does not show the site being allocated for housing and/or convenience retail development and as a result lacks clarity.

Bridge of Weir Community Council (2065)

The vacant brownfield ground associated with the land at CH Bull is in a prominent position in the village which currently detracts from the overall townscape. Although the site provide local employment and services for the village there is potential for small scale development on this brownfield part of the site that would not impact on the garage facilities.

Land south of Kilmalcolm Road and Strathgryffe Crescent (Site: 2285)

Andrew Forrest Properties (85)

This site is more appropriate than the allocated site at Shillingworth in terms of location, connectivity to local services, sustainability and ability to provide a more defensible green belt boundary. Development proposals have the potential to enhance, physically define and strengthen the green belt boundary. The site is not prominent but any development would need to be of a design and layout to sensitively integrate with the surroundings. The site is very close to the existing town centre and benefits from being adjacent to the National Cycle Route which connects directly to the town centre. It is within walking distance of local services and schools. It is an effective site with no constraints in terms of ownership, physical attributes, contamination, funding, marketability and infrastructure.

ALEFTAV LTD (2072)

This site benefits from being able to absorb the housing and care needs of Bridge of Weir. The site would complete the village envelope and tie in with the rest of the village. A sensitive and beautifully mixed development can be provided which will integrate well, create a sense of place and connect with the community. Proposed development would be low density replicating the density of the surrounding area. This is a sustainable site which is close to the town centre and amenities making it more accessible than the allocated site at Shillingworth. There are available solutions to overcome the technical and level issues. There is no risk of flooding. The riparian river edge will be maintained and protected. Access to the site can be formed without significant impact to existing residents. The landowner has full ownership. A national housebuilder has expressed interest in the site.

Kilbarchan Road (Site: 2228)

Ranfurly Estate (1980)

This potential development site would actively assist in achieving the necessary housing numbers for Bridge of Weir and Renfrewshire as a whole. The site is single ownership with no constraints to delivery. There is advanced discussions with a house builder and consider the site is more immediately marketable than other sites within Renfrewshire. This is a viable site, deliverable within the LDP period. It is recommended that further land is released from the green belt to meet the necessary housing land requirements and it is more appropriate for this site, which is adjacent to the existing settlement, to be released. It is a sensible and logical extension to the east of the existing settlement. The inclusion of a landscape buffer would minimise visibility and the impact of the development as well as the existing trees to the south of the site acting as a strong boundary to the development, providing an attractive setting to new housing.

David Wilson Homes (2095)

The 8.1ha site should be removed from the green belt and included within the settlement boundary as it represents a sustainable location for future housing development of new family and affordable housing, close to established residential areas and facilities capable of being well integrated with existing built form, access and public transport provision. Development of this site represents the most logical direction of growth for the settlement. Although an elevated site, planting would soften and screen development allowing integration with existing green infrastructure features and built form. Developing this site will consolidate development, not increase sprawl due to the presence of a stream as this acts as a natural barrier. It will not cause coalescence or increase visual intrusion into the surrounding countryside. The majority of the site is on relatively flat land and can be developed with minimal land raising works. Access is achievable with an opportunity to provide enhanced foot and cycle connections. The site is effective, free from constraints, within a highly marketable area to prospective purchasers.

Lawmarnock Road (Site: 5001)

Old Course Ranfurly Golf Club (146)

This site has been unfairly excluded from the LDP and should be reconsidered. The representation made by Cala Homes (West) is supported. The representation made by Cala to the MIR stage addressed all issues raised by the Planning Authority and are therefore surprised and disappointed that the site has not been included. The allocated site at Shillingworth will arguably be more prominent and widely visible than the site at Lawmarnock Road and therefore question the consistency between the decision to release the site at Shillingworth and not this site.

CALA Homes (West) (2114)

The Council has failed to assess the site at Lawmarnock Road in an objective and accurate manner. The site boundary which has been used by the Council to assess the site is incorrect. The submission to the proposed LDP promotes a smaller area of land which does not extend beyond the line of the escarpment to the eastern edge of the site. Development of this site would accord the LDP's Places Strategy providing around 9 homes within a landscape framework supportive of green network objectives. The site is

in a sustainable location in terms of access to public transport provision, the proximity of local amenities, including schools and open spaces. Development of the site will not limit the current recreational space associated with the golf course. The existing landscape has the capacity to accommodate the development without impinging on the landscape setting of the village or create ribbon development. Existing mature trees located around the edges of the site will provide containment. This would be an infill development resulting in urban consolidation and would form a logical extension to the town.

Whitelint Gate (Site: 5028)

Paterson Partners (2003)

This is a 5.4ha sustainable brownfield site perfectly suited for housing development and therefore the green belt boundary should be amended to exclude the site. This brownfield site within the green belt is effective and should be released for development before any greenfield sites, in particular before the allocated site at Shillingworth. The site is recognised as having development potential and is effective in terms of access and drainage, is suitably positioned in terms of landscape, there are no impediments to viable development, it is within single ownership. The site is capable of development without significantly affecting the wider landscape character.

The owner is promoting two options for the development of this site. The 'preferred' Option 1 comprises the development of a medium sized retail store and petrol filling station with the possibility to also develop 33 family, higher density designed houses and 17 affordable/keyworker houses provided through a private shared equity scheme if design allowed and it was considered appropriate within the site. Option 2 would comprise 40 family houses and 15 affordable/keyworker units, again these units could be private shared equity tenure. There may also be an opportunity to also provide 5 - 10 small employment/business units to assist local employment generation.

Both options can effectively be developed within a 2 – 3 year timescale as both have operator interest in development the site for retail and residential. Both options would be developed along with 12ha of community woodland with around 3000 indigenous trees as well a network of access routes linking into surrounding areas and to the existing cycle route with a contribution of £500,000 towards infrastructure improvements in the local area which could include maintenance of a nearby park would also be provided as part of the development.

Modifications sought by those submitting representations:

General Strategy

Michael Hopcroft (344)

Remove all identified residential sites within Bridge of Weir from Schedule 1, 2 & 3 in the LDP.

Clevans Road (Site: 2241)

Ranfurly Estate (1980)

The designation of this site at Clevans Road as a development site for a dwellinghouse.

Ranfurly Castle Golf Club – Clevans Road (Site: 2247)

Ranfurly Castle Golf Club (16)

The site at Clevans Road should be included within Schedule 1 or 2 of the LDP for an indicative capacity of 5 units.

CH Bull Garage Site, Kilmalcolm Road (Site: 5015)

CH Bull & Sons (2038)

The LDP proposals map should be amended to show the site 5015 at Kilmalcolm Road be allocated for housing and/or convenience retail development.

Bridge of Weir Community Council (2065)

No modifications suggested.

Land south of Kilmalcolm Road and Strathgryffe Crescent (Site: 2285)

Andrew Forrest Properties (85)

The site at 'Land to the south of Kilmalcolm Road and Strathgryffe Crescent, should be identified as suitable for future housing development in order to meet the anticipated housing land requirements in the town over the plan period.

ALEFTAV LTD (2072)

Recommend omitting Shillingworth site in favour of Kilmacolm Road site, or an allocation of both sites.

Kilbarchan Road (Site: 2228)

Ranfurly Estate (1980)

The designation of this site at Kilbarchan Road as a development site for future housing development.

David Wilson Homes (2095)

Land at Kilbarchan Road should be removed from green belt and included within the settlement boundary of Bridge of Weir as a housing allocation subject to Policy P3, Schedule 2 of the LDP.

Lawmarnock Road (Site: 5001)

Old Course Ranfurly Golf Club (146)

No modifications suggested.

CALA Homes (West) (2114)

The site at Lawmarnock Road should be added to Schedule 1 of the LDP as a green belt release site for 9 units.

Whitelint Gate (Site: 5028)

Paterson Partners (2003)

That Schedule 1 of the LDP should include the Whitelint Gate site as a housing redevelopment opportunity for 40 units.

Summary of responses (including reasons) by planning authority:

General Strategy

Michael Hopcroft (344)

Various upgrades to the existing road system along with additional traffic and transportation measures will be required in the delivery of new developments. The potential impact to the truck road network has been assessed strategically by Transport Scotland and the council have analysed the effect on the local transport network. The development proposals highlighted in the Renfrewshire Proposed Local Development Plan (LDP) are unlikely to have a significant impact on the surrounding road network.

Clevans Road (Site: 2241)

Ranfurly Estate (1980)

Policy ENV1 – Green Belt states that ‘appropriate development within the green belt will be considered acceptable where it can be demonstrated that it is compatible with the provisions of the New Development Supplementary Guidance (CD/09).’ A single dwellinghouse on this site which is appropriately designed, fits well in the surrounding landscape and contributes to the place would be considered through the submission of a planning application. It is not considered necessary to take this small site out of the green belt.

Ranfurly Castle Golf Club – Clevans Road (Site: 2247)

Ranfurly Castle Golf Club (16)

The construction of 5 units at this site is excessive and would not reflect the layout, siting and character of the residential units in the surrounding area. Policy ENV1 is not in place to prevent development from happening, it aims to maintain a clear definition of the boundary of settlements. Although maybe 2 or 3 well designed dwellinghouses may be suitably accommodated on this site, a clearly defined green belt boundary would be difficult to identify leading to the possibility of further ribbon development stretching along Clevans Road. Details would need to be tested through the submission of a planning application. Not appropriate to take this small site out of the green belt.

Bulls Garage Site, Kilmalcolm Road (Site: 5015)

CH Bull & Sons (2038)

An existing operational commercial site in the middle of the village. Should the current use cease operation then this site poses a good opportunity for redevelopment for various uses including residential given its sustainable location within the existing settlement. To identify this site as an opportunity for redevelopment with preferred uses identified as housing and/or convenience retail is considered to be premature since the use has not ceased, as well as this identifying it on the proposals map would narrow the options for redevelopment should this site become available. Furthermore the proposed LDP zoning covering this site (Policy P1) allows for development which is compatible and complementary to existing uses, aiming to allow for a range of development opportunities that improves places and creates attractive environments. The submission of a planning application to assess the compatibility and the design aspects of any development could be submitted at any time, rather than singling out an existing operating business as an individual development opportunity site. The Policy P1 zoning is appropriate for this site.

Bridge of Weir Community Council (2065)

Agree that there is potential for small scale development on this site. Again the proposed LDP zoning covering this area would allow for small scale development provided it complied with the LDP New Development Supplementary Guidance (CD/09).

Land south of Kilmalcolm Road and Strathgryffe Crescent (Site: 2285)

Andrew Forrest Properties (85)

Agree that this site is in a more sustainable location than the allocated site at Shillingworth due to the good access to and the close proximity of the site to various facilities and services. However, development at this site is undesirable given that it would have a disjointed relationship with the existing settlement due to the landform of the site and built form surrounding the site. It is considered a difficult site to integrate with existing housing in the village, contributing very little to the sense of place. The site makes a positive contribution to the setting of Bridge of Weir in that the green wedge contributes to the landscape setting at the gateway to the settlement to the north west along Kilmalcolm Road and also when approaching from the west along Torr Road. The site has a clear and well defined green belt boundary to the north, east and southern sides, with the western boundary to the adjoining fields separated by a dilapidated stone wall or post and wire fencing. Development of this site would extend the settlement into rural open farmland, resulting in development spreading further along Kilmalcolm Road. Rezoning this land would make the green belt boundary less defensible and therefore although the site is in a sustainable location on balance the site is inappropriate for development.

ALEFTAV LTD (2072)

It is considered that the development of this site would not complete the village envelope, it would result in development of a green wedge within the settlement which has very little frontage and limited relationship with the place. Even with a well designed sensitive layout, it is difficult to see how development of this site is able to have a positive impact on the character and amenity of the place. Providing a vehicular link to the site with pedestrian access through existing housing does not provide the positive integration required for release of this green belt site. As outlined above, the site is in a sustainable location but there are other negative implications of developing this site which is the

reason that Shillingworth was put forward as a preferred location for housing development. Accessing this site with the requirement for a vehicular bridge over the existing cycle route is likely to be achievable, but it would be costly. It is agreed that there are technical solutions to overcome the various issue associated with the site and this would be a part of the design and layout of the site. The allocated housing site at Shillingworth is also considered to be an effective site in line with PAN 2/2010: Affordable Housing and Housing Land Audits (CD/42). The alternative suggested housing site is considered to be less effective.

Kilbarchan Road (Site: 2228)

Ranfurly Estate (1980)

Developing the site at Kilbarchan Road would add a substantial amount of new housing units to the settlement which will require the delivery of significant infrastructure improvements. The proposed LDP spatial strategy aimed to identify sites across Renfrewshire that made the most efficient use of existing infrastructure so that sites that were identified could be delivered in the lifetime of the plan. Given the site preparation requirement to deliver this development, it could not be counted as an effective site in this proposed LDP. As highlighted above the allocated housing site at Shillingworth is considered to be an effective site in line with PAN 2/2010: Affordable Housing and Housing Land Audits (CD/42) and is preferred due to the deliverability of the site without the need for a significant amount of physical interventions, infrastructure, etc. The site at Kilbarchan Road is one of a number of sites that has been considered for release for housing development given that it is adjacent to the existing settlement, however, this is a prominent site which is highly visible on the entrance and exit to the settlement and it is not acceptable. It is considered to be sensitive to development as it would be difficult to lessen the negative impact on the setting and character of the settlement. Although there is boundary treatment on all sides of the site, there is poor containment and, therefore, rezoning this land would have an impact on the integrity of the green belt land surrounding the site. This site is unacceptable for development.

David Wilson Homes (2095)

This site is considered to have less of a relationship with the existing settlement than the allocated housing site at Shillingworth and other suggested alternative housing sites around Bridge of Weir. Although adjacent to existing houses, the location of this site would not reflect a logical extension to the settlement given that it would elongate the village form rather than produce a compact sustainable layout. It is considered that it would be a challenge to successfully integrate site with the existing built form. The development would have a significant visual impact, be obtrusive and incongruous in the landscape and wider setting of the village. Again it is difficult to see how a planting scheme can effectively screen the development. Although coalescence is unlikely to occur with development of this site, sprawl and the spreading of development to other fields around this site is unacceptable. It is agreed that there are technical solutions to overcome the various issues associated with the site, however in terms of PAN 2/2010: Affordable Housing and Housing Land Audits (CD/42), there are other more effective sites.

Lawmarnock Road (Site: 5001)

Old Course Ranfurly Golf Club (146)

It is agreed that there are technical solutions to overcome the various issues associated with the site, however this site continues to be zoned as green belt because it offers a green network connection to recreational opportunities. The site at Shillingworth may appear more prominent in the overall setting of the village than the site at Lawmarnock Road, however, this site is an important asset for the place, a green wedge amongst the residential area which provides a degree of flora and fauna which appears integral to the area. The proposed Renfrewshire Local Development Plan sets out policies that seek the retention and promotion of green areas and open space. The proposed LDP looks to create and preserve high quality natural environments with access to good quality open space. Therefore the retention of this site in green belt accords with policy framework set out in the plan.

CALA Homes (West) (2114)

The Council has openly and transparently assessed the relative merits of the various options that were submitted for the site at Lawmarnock Road at the various stages in the LDP process. The Council assessed the implications of development on this green belt site and, although detailed layouts were provided, it was considered that any housing positioned on this site would change the green network and open space character to the detriment of the surrounding area. This green finger on the edge of the golf course makes a positive contribution to the area encouraging connectivity for people and species and is important for the overall place. Although a landscape framework is proposed for the residential units, development takes away an open and natural environment and replaces it with a more formal, built form, which maintains access but reduces the natural features on the site. Retention of existing trees around the site with additional landscaping would help lessen the impact of development but a green wedge would be lost in the middle of this built-up area. It is agreed that the site is sustainable, within the existing built-up area, consolidates the built form and an infill development within the settlement, however for the reasons outlined above is not considered the preferred option for housing development in Bridge of Weir and for that reason the land use zoning should remain as green belt.

Whitelint Gate (Site: 5028)

Paterson Partners (2003)

It is agreed that the area of the site that was previously used as a landfill site can be considered as brownfield land which has regenerated and contains a range of vegetation and trees. It is also considered that over the years the site has developed into a woodland area at the gateway to the settlement, creating a natural setting at the edge of Bridge of Weir. Rezoning this land for development or identifying this site as part of the built up area within the settlement would require the formation a new defensible boundary edge of which a 12 hectare of community woodland has been proposed by the landowner on existing open, undulating agricultural fields to the east of the village. However, allowing development of agricultural land in line with the details submitted would result in the loss of both a natural vegetated area and farmland. Furthermore, the new indigenous trees will take some time to establish into a community woodland and replace the woodland edge that already exists. It is considered the site for development does have a degree of containment. However, the fields to the east of the existing woodland area have a very open aspect to the other surrounding grazing fields with poor containment. Allowing development at this location, with the removal of a defensible boundary edge, would

result in the possibility of development spreading along these fields which in turn would have an adverse impact on the landscape character as well as the visual profile of the area and therefore such development is undesirable. It is also considered that the proposed new housing, whether in the form of Option 1 or Option 2, will have a limited relationship with the existing residential units to the west as it would be difficult to integrate the new housing with the existing built form. It is agreed that there are technical solutions to overcome the various issues associated with the site and the new access formed would be a road safety benefit in that it would slow traffic on the gateway to the village. However, it is unlikely that the development would make a positive contribution to the settlement as a whole given that this former tip site provides a woodland wedge which is now part of the landscape at the gateway to the village. Since the original submission it is recognised that the proposals for the site has significantly decreased whilst maintaining many of the community benefits associated with development, however, it is still considered that the site is undesirable for development.

In conclusion, the council continues to support the spatial strategy in the proposed LDP and do not propose to rezone any of the above sites as residential and they will remain zoned as green belt.

Reporter's conclusions:

General

1. As stated in the conclusions in the report on Issue 17, the proposed plan does not identify sufficient land on a range of sites which are effective or capable of becoming effective to meet the housing land requirement up to year 10 from adoption, ensuring a minimum of 5 years effective land supply at all times. Further sites will therefore need to be identified by a review of housing land supply. I have therefore assessed the sites under this issue on their individual merits.

2. In 2012 the council undertook a strategic review of the Renfrewshire green belt (CD49) as part of the preparation for the plan. The council has openly and transparently assessed the relative merits of the various development options which were available. These assessments include traffic and transport impacts. The development proposals highlighted in the local plan are unlikely to have a significant impact on the surrounding road network.

Clevans Road (site 2241)

3. I agree with the council's overall planning assessment (CD06) that this site on the edge of the built up area could accommodate one house on the footprint of the existing structure without significant detrimental impact to the green belt. The council has stated that a single dwelling on this site which is appropriately designed, fits well in the surrounding landscape and contributes to the sense of place would be considered through the submission of a planning application. I place significant weight upon that statement in reaching the conclusion that the site should remain in the green belt for now and that green belt policies should apply to any development proposal.

Clevans Road (site 2247)

4. This site lies on the north side of Clevans Road with residential development to the east and to the south, on the other side of the road. I agree with the council that a

development of 5 dwellings on this small site would constitute overdevelopment since neighbouring development consists mainly of large detached properties with substantial gardens. The council's landscape assessment (CD08) states that the site has a high recreational and visual amenity value based on the cultural and recreational value of the adjoining golf course. It goes on to state that the site contributes to the rural - urban fringe of the settlement and locally improves the setting of the settlement. While the site is sensitive to development it could accommodate a degree of appropriate development in small areas of the site. I see no reason to disagree with that assessment. Part of the site is overgrown with wooded scrub but I can see how a small, well designed, development might be appropriate for this site.

5. As stated in the conclusions in the report on Issue 17, further housing sites need to be identified. The council states that 2 or 3 well designed dwellings may be suitably accommodated on the site but careful consideration would require to be given as to how a defensible green belt boundary could be established. In view of the foregoing, and because of the contribution that the site currently makes to the settlement setting I am of the view that the site should remain in the green belt at the present time. That would not prevent suitable development but details would require to be tested through the submission of a planning application. In reaching this conclusion, I have attached considerable weight to the council's positive statement regarding the scale of development that might be accommodated on this site.

Bulls Garage Site

6. It is suggested that the site could be developed for a mixture of housing and/or convenience retail. Retail matters in Bridge of Weir are addressed in Issue 6. The site is covered by Policy P1 which allows new developments which are compatible and complementary to existing uses. The council agrees that this site has potential for redevelopment for various uses, including retail and residential. In view of this, any redevelopment of the site can be determined by way of a planning application. It is not necessary to allocate a specific use for the site.

Land south of Kilmalcolm Road and Strathgryffe Crescent

7. The northern section of this site lies to the north of National Cycle Route 75, which follows an old railway cutting. This part of the site comprises mainly overgrown shrub and grass land. The larger part of the site lies immediately to the south of Route 75 and the neighbouring dwellings in Strathgryffe Crescent and Glengowan Road. It is roughly triangular in shape, sloping down to the south and the River Gryffe, which forms the southern boundary. The site is currently used as a grazing field. The western boundary of the site is formed by post fencing, beyond which lie open fields. The adjoining land uses and sloping landform provide good containment to the north but the site is visually open to the west and highly prominent when viewed from Torr Road to the south.

8. SPP makes clear (paragraph 162) that green belt boundaries should be clearly identifiable on the ground, using strong visual or physical landscape features such as rivers, tree belts, railways or main roads. The site is bounded by Route 75, and the buildings beyond, to the north and by the river to the south. These provide well defined green belt boundaries. Although it is proposed to provide a landscape buffer along the open western boundary of the site, a strong and effective green belt boundary as envisaged by SPP would take a long time to establish.

9. The site is in a prominent location and the sloping southern section thereof provides an attractive setting and green wedge into the settlement, particularly when viewed from the west and south. Development of the site would extend the settlement into open countryside and would impact adversely upon the landscape setting of the settlement. The council's green belt review has also found this site to be unsuitable for residential development. I accept that the site is in a good location in terms of accessibility to facilities and services but that is insufficient to overcome the problems identified above. For the foregoing reasons, allocation of this green belt site cannot be supported.

Kilbarchan Road

10. This large (9 hectare) site comprises three open, grazing fields between Kilbarchan Road, Crosslee Road and the A761 Bridge of Weir road. From the high point of Kilbarchan Road this highly visible site slopes down to the east. A thick belt of established trees along the southern boundary provides the only containment. Beyond the A761 to the east lies open farmland and to the west of the site, opposite Kilbarchan Road, is a grazing field and some industrial buildings.

11. The site is very prominent, particularly when viewed from the approaches to the settlement from the east and south. The proposed development would result in a very large, elongated, illogical extension of Bridge of Weir. It would certainly not result in a compact and successful integration with the existing settlement. There would be a significant adverse impact upon the existing landscape and the setting of this part of Bridge of Weir. For these reasons, the site should not be allocated for housing development.

Lawmarnock Road

12. This approximately rectangular site lies on the east side of Lawmarnock Road with Old Ranfurly Golf Course to the east and south of the site. On the west side of the road, and to the north of the site, lie residential properties. The site is overgrown with scrub vegetation and is divided almost in half by an escarpment running diagonally through it. The council's landscape assessment states that land below this escarpment is of low prominence and could be developed without negative impacts on the setting and character of the settlement. Above this escarpment the golf course fairway would be outwith the natural settlement boundary created by the escarpment. The council has identified no significant traffic or transportation issues associated with this site. There is no suggestion that the site is not effective. A flood risk assessment would, however, be required and the burn that bisects the site would require to be left open, limiting the developable area.

13. I note that a development of some 9 houses is proposed for this site. The site is on the periphery of the existing settlement and the northern part of the site is fairly well contained by neighbouring housing and woodland. Although there would obviously be some localised impact, from my own observations, I am satisfied that subject to appropriate conditions, a small development could be satisfactorily accommodated on the land below the escarpment without wider adverse landscape or visual impact. In my opinion, development on the golf course would represent an unacceptable intrusion into open green belt. The site forms part of the green belt at present. However, as the escarpment provides a natural break, this small site could be allocated as housing land with no significant harm to the green belt.

Whitelint Gate

14. This site is located within the green belt in the proposed plan and is subject to policy ENV1 – Green Belt. This means that only appropriate development which is compatible with the provisions of the New Development Supplementary Guidance will be acceptable (agriculture, horticulture, forestry/woodlands, an established business, essential infrastructure, tourism development). Housing development of the scale suggested would not be considered to be acceptable.

15. The site is brownfield land, having formerly been used as a builders' yard and landfill site. This does give it some advantage in terms of any redevelopment proposal. I also note that the council's landscape consultant considered the site to be well contained in landscape terms by the surrounding undulating fields and that mitigation planting would be required to create a new settlement boundary limiting future development.

16. I noted at my site visit that, although the site may be regarded as derelict land, it has naturally regenerated over the years since it was used and is covered with shrubs and trees. I agree with the council's assessment that it has developed into a woodland area at the edge of the settlement, creating a ready-made natural setting for this western edge of the village. Development of the site would remove most, if not all of the existing vegetation. A community woodland would be planted on the fields to the west of the site to compensate for this removal, and I acknowledge that this would be of some benefit.

17. The council points out that developing the site itself and planting the woodland on its western edge would result in the loss of both a naturally vegetated area and farmland. The council is also concerned that the new woodland would take some time to establish and replace the woodland edge that already exists. The council considers that the proposed new housing would have a limited relationship with the existing residential units to the west and that it would be difficult to integrate the new housing with the existing built form. I agree with the council's analysis in this regard, although I accept that integration with the national cycle route would be beneficial.

18. As stated in the conclusions in the report on Issue 6 an allocation for a retail development is not supported at this time. However, it is apparent from that report that retail use may be acceptable on the site if another more suitable site within the village could not be found. For that reason and also for the concerns expressed by the council, the identification of any part of the site for development would be premature at this time.

Reporter's recommendations:

Add the site at Lawmarnock Road, Bridge of Weir to Schedule 2 of the proposed plan as a green belt release and with an indicative capacity of 9 units.

Issue 27	Elderslie - Alternative Suggested Housing Site	
Development plan reference:	None	Reporter: Ron Jackson
Body or person(s) submitting a representation raising the issue (including reference number):		
Elderslie Estates (12)		
Provision of the development plan to which the issue relates:	Alternative suggested housing site on greenbelt land at Elderslie	
Planning authority's summary of the representation(s):		
<p><u>Elderslie Estates (12)</u></p> <p>Promotion of 3.2 Ha of land between Dunvegan Avenue and Glenpatrick Road, Elderslie (Site Ref.2293) for housing. The site has a semi-urban character and is bounded to the north by the allocated Abbey Road housing site, to the east and west by housing and to the south by woodland and pasture. To the south it is partially visually constrained by rising ground and existing woodland at the south east corner. This can be strengthened by extending this woodland along the southern boundary which will result in a more robust green belt boundary. The site is accessible to local services, public transport and the green network. A traffic assessment will be able to demonstrate that the site is able to be satisfactorily accessed. Flooding and drainage issues are capable of being resolved. The site is of interest to a national house builder and is capable of delivery within 10 years.</p>		
Modifications sought by those submitting representations:		
Land between Dunvegan Avenue and Glenpatrick Road, Elderslie should be added to Schedule 2. (12)		
Summary of responses (including reasons) by planning authority:		
<p><u>Elderslie Estates (12)</u></p> <p>The most important consideration about this sites green belt function is the maintenance of the landscape setting of towns. This site is located in a prominent location when travelling to and from the south along Glenpatrick Road. This site is visually part of the green belt. The site creates an attractive setting for the settlement and is visually part of the open undulating landscape south of Elderslie. It is agreed that the extension of the existing woodland could provide a stronger greenbelt boundary. There is, however, no containment of the site towards the west, as the boundary is mid field and does not follow any features. It is not considered that the proposed green belt boundary would be an improved boundary when compared to the established field hedge to the north.</p>		

Due to its location, away from a main road frontage, the development of this site would be challenging to integrate positively with the existing built form. It is agreed that site specific concerns relating to flooding, drainage and gaining a suitable access could be mitigated with the aid of detailed assessment, however, for the reasons given above development of this site is not considered to be desirable and the green belt designation should remain.

Reporter's conclusions:

1. As stated in the conclusions in the report on Issue 17, the proposed plan does not identify sufficient land on a range of sites which are effective or capable of becoming effective to meet the housing land requirement up to year 10 from adoption, ensuring a minimum of 5 years effective land supply at all times. The council will be expected to produce further guidance to resolve this. I have therefore assessed the site under this issue on its individual merits.
2. The site comprises undulating open grazing fields with an established hedge along the northern boundary, beyond which lies the allocated Abbey Road housing site. There are mature trees in the south east corner of the site. The eastern boundary of the site is formed by the rear gardens of residential properties and a low stone wall along Glenpatrick Road. The southern boundary runs along a track with established woodland to the south thereof and the south western boundary runs across the middle of an open field. The western boundary comprises the rear gardens of the properties in Dunvegan Avenue.
3. The council's assessment of this site shown in CD06 highlights the impact that development of this prominent site would have on the landscape and setting of the area. The assessment also indicates that the site is not suitable for residential development since it forms an important green wedge. Based on my observations at the site, I find that the site is open with little containment apart from the south eastern corner. I agree that the site is prominent in the landscape when viewed from Glenpatrick Road but also from the southern part of Dunvegan Avenue. The south western boundary of the site is simply a line across an open field and follows no topographical features. Although it is proposed to extend the existing woodland along the southern boundary in order to provide a more robust green belt boundary to this site, SPP makes clear (paragraph 162) that green belt boundaries should be clearly identifiable on the ground, using strong visual or physical landscape features such as rivers, tree belts, railways or main roads. That is not the case here.
4. The revised greenbelt boundary resulting from the development of the Abbey Road site to the north of this site would follow a crest in the landscape and the existing boundary hedge would be enhanced to create a robust and defensible greenbelt boundary. Again based on my observations at the site and in the surrounding area, I am satisfied that development of the site now proposed would result in an unwelcome intrusion into open countryside and would impact adversely upon the landscape setting of the settlement. Although further housing sites will need to be identified, this can be achieved by the council producing supplementary guidance. For the foregoing reasons development of this green belt site cannot be supported.

Reporter's recommendations:
No modifications.

Issue 28	Erskine – Alternative Suggested Housing Sites	
Development plan reference:	None	Reporter: Dannie Onn
Body or person(s) submitting a representation raising the issue (including reference number):		
Blythswood Estate (2104) CALA Homes (West) (2114) Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112)		
Provision of the development plan to which the issue relates:	Alternative suggested housing sites on green belt land around Erskine including Northbar and Southbar/Linburn	
Planning authority's summary of the representation(s):		
<u>Land at Northbar, Erskine (Site Ref 5003)</u> <u>Blythswood Estate (2104)</u> Blythswood Estate is in the late stages of discussions with Cala Homes (West) with regard to this site, and submissions have been made separately by Geddes Consulting on behalf of Cala Homes (West) on this site which we support. The site at Northbar, Erskine, is an effective and viable site, capable of development within the plan period. The site is an appropriate and logical extension to the existing residential development to the south east of Erskine, proposing a modest extension to the settlement. The proposed development is well supported with good transport infrastructure links and existing services within the town of Erskine. It is considered that this site is suitable and appropriate for inclusion in the LDP period, therefore adding towards the necessary housing land supply within Erskine, and Renfrewshire as a whole. <u>CALA Homes (West) (2114)</u> The Council has failed to assess the submitted proposal for the Northbar site in an objective and accurate manner. This conclusion is confirmed in the Comparative Assessment set out in the Development Framework Report. The Council's Assessment also does not take account of the submission made to the Main Issues Report regarding the land uses proposed for this site. This is an effective site which would be fully developed over the LDP period. The development would accord with the LDP's Places Strategy providing around 200 homes within a landscape framework supportive of the LDP's Green Network objectives. Development of this site would represent a modest and sustainable extension to Erskine. It is an infill development which connects visually and physically with the settlement edge and capitalises on its proximity to existing services in the town, motorway infrastructure and economic development opportunities in the surrounding area. The development would improve the quality and use of open space in this area. The existing landscape has the capacity to accommodate development without impinging on the landscape setting of Erskine or Inchinnan. It would not lead to the coalescence of Erskine and Inchinnan, as these settlements are already coalesced. The		

existing woodland to the south and west of the site continues to perform the function of a 'green wedge', and the development of this site will not compromise this function. The Category A listed Northbar House located adjacent to the site to the south is well screened by the existing surrounding woodland and is unlikely to be affected by the development proposal. The development provides the opportunity to reposition and strengthen the existing Green Belt boundary in this location.

Land at Southbar/Linburn, Erskine (Site Reference 5004)

Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112)

The Council has failed to assess the submitted proposal for the Southbar/Linburn site in an objective and accurate manner. This conclusion is confirmed in the Comparative Assessment set out in the Development Framework Report. The site boundary which has been used by the Council to assess the site is incorrect, a much larger site (156 hectares) has been assessed. The submission to the Proposed LDP promotes a smaller area of land, only 67.3 hectares located adjacent to the settlement edge within an existing landscape framework. The Council's Assessment also does not take account of the submission made to the Main Issues Report regarding the land uses proposed for this site. This is an effective site which would accord with the LDP's Places Strategy providing around 720 homes, a foodstore, local shops and potentially a new primary school within a landscape framework supportive of the Green Network objectives. Development of this site would represent a sustainable extension to Erskine which capitalises on its proximity to existing services in the town, public transport, motorway infrastructure and economic development opportunities in the surrounding area. The development of the site would reduce the area of open space which is accessible but will provide opportunity for major improvements to the existing green network within the site providing a series of alternative high quality spaces. The existing landscape has the capacity to accommodate development without impinging on the landscape setting of Erskine. The development will enhance the settlement identity on this edge of Erskine and will integrate well with the settlement with no significant impact on the landscape and townscape character. A combination of existing trees and landform provide containment meaning this site is visually discrete from the wider landscape. The development provides the opportunity to reposition the existing Green Belt boundary in this location, with a new strong and robust boundary. The impact of this site, with an indicative capacity of 720 homes to be built out over an eight year period, cannot be considered to conflict with the delivery of the Bishopton CGA, with an indicative capacity of 2,500 units to be built out over a twenty year period. If the house builders see no conflict in developing both sites, there is no justification to conclude that the allocation of this site will be detrimental to the delivery of the Bishopton CGA.

Modifications sought by those submitting representations:

No modifications suggested. (2104)

The site at Florish Road, Northbar, Erskine should be added to Schedule 1 of the LDP as a green belt release site for 200 units. (2114)

The site at Southbar/Linburn, Erskine should be added to Schedule 1 of the LDP as a green belt release site for 720 units. (2112)

Summary of responses (including reasons) by planning authority:

Northbar, Erskine (Site: 5003)

Blythswood Estate (2104)

It is agreed that this site is capable of being developed within the period of the plan. However, this site is considered to be an asset for the place, a locally important green wedge which positively contributes to the landscape setting providing the last remaining green separation space between Erskine and Inchinnan. It is noted that Blythswood Estate are fully supportive of the submission from CALA Homes (West), therefore, see the response to 2114.

CALA Homes (West) (2114)

The Council has openly and transparently assessed the relative merits of proposals that were submitted for the site at Northbar, Erskine at the various stages in the LDP process. The Council assessed the implications of development on this green belt site and although detailed layouts were provided, it was considered that any housing positioned on this site would have an impact on the landscape setting and visual amenity of this area. Although a landscape framework is proposed for the residential units, building on this site takes away an open and natural environment and replaces it with a more formal built form losing this natural asset. The site is considered to be a part of the green backdrop to the area which contributes to a sense of place and the overall landscape setting. The site has limited frontage to Florish Road and it is difficult to see how the development could fully integrate with the existing residential form. It is agreed that this site would appear to be an area of infill when looking at the proposals map, however, on the ground this is a locally important green wedge. While separation between Erskine and Inchinnan is not easily distinguishable in other areas, this site retains an area of separation which makes a positive contribution to the place. It is agreed that the Category A listed Northbar House located adjacent to the site is well screened by the existing surrounding woodland and is unlikely to be affected by the development proposal. The existing green belt boundary may be uneven, particularly where it is formed along the line of rear gardens, however, through time this boundary has become well established in the area and it is important that this is retained.

It is agreed that the site is sustainable and deliverable with no significant constraints to development, however, for the reasons outlined above is not considered that the development would make a positive contribution to the settlement and will remain zoned as green belt.

Land at Southbar/Linburn, Erskine (Site: 5004)

Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112)

The council has openly and transparently assessed the relative merits of the various options that were submitted for the site at Southbar / Linburn at the various stages in the LDP process. The council is fully aware that the proposal for the original submission at the Suggestions for Land Use Change stage for this site has significantly decreased in size, however, as outlined in the final site assessment, 'Housing Land Requirements' Background Paper 3 (CD/41) to the proposed LDP, it is still considered that the site is undesirable for development. The council fully assessed the implications of development on this green belt site and although detailed layouts were provided, it was considered that

this proposal would have an impact on the landscape and the wider setting of the area, constituting a spreading of the built-up area into sensitive green belt land to the detriment of this part of Erskine. Allowing this proposal, in line with the details submitted, would not protect areas of agricultural land from inappropriate development. Although a landscape framework is proposed, and it is accepted that the proposal would open up this area to the public for recreational purposes with positive additions to the green network which is seen as a priority in the proposed LDP, the development would take away an open and natural environment and replace it with a more formal, built form, which will reduce the natural features on the site. This site is important to the landscape setting of Erskine particularly from the viewpoint of Southbar Road and Old Greenock Road. Development of this site would change the landscape character and the visual profile of the area. While the retention of existing trees around the site with additional planting and landscaping would help lessen the impact of development, it would take many years to have the desired effect. Furthermore, the green belt boundary in this area is well defined by Southbar Road and Old Greenock Road. This remains a more effective, recognisable and defensible boundary than the meandering line shown on the indicative plan and for these reasons it is important that this clear and defensible boundary is retained to prevent development spreading to the fields to the south. The council recognises the possible benefits to the town in the provision of additional shops and potentially a school, however, until the residential area exists these facilities cannot be justified and these potential benefits alone do not justify the release of this important area of green belt land.

The proposed LDP Strategy is to focus firstly on the regeneration of brownfield sites and the council remains concerned about the close proximity of this site to Bishopton Community Growth Area (CGA) and the potential for this proposal to be detrimental to the delivery of this development. It is recognised that both Persimmon and CALA are involved in the development of the CGA, however, at present this accounts for 227 units out of the 2500 units proposed and therefore there could still be considerable doubt regarding the deliverability of the CGA, should there be a large scale green belt release in such close proximity.

It is agreed that the site is deliverable with no significant constraints to development, however, the suggested access to public transport and the frequency of the bus service on Old Greenock Road is incorrect. At present, Old Greenock Road is out with the main high frequency bus routes within Erskine, however, given the scale of the proposed development it is accepted that there could be a solution to the public transport provision making use of the existing bus stops on Old Greenock Road. In addition, while there is capacity within existing schools within Renfrewshire further consideration would have to be given to the educational requirements/provision for this proposal given the scale of development.

For the reasons outlined above it is considered that such development would be undesirable as it would form an unwelcome intrusion in the landscape and would not make a positive contribution to the settlement, it will therefore remain zoned as green belt.

Reporter's conclusions:

General

1. As stated in the conclusions in the report on Issue 17, the proposed plan does not identify sufficient land on a range of sites which are effective or capable of becoming

effective to meet the housing land requirement up to year 10 from adoption, ensuring a minimum of 5 years effective land supply at all times. The council will be expected to produce further guidance to resolve this. I have therefore assessed the sites under this issue on their individual merits.

2. The strategy for the proposed plan is to focus development on brownfield sites in preference to greenfield. However, the brownfield and other urban land suitable for residential development will not meet the housing need and demand, nor would it provide the generous and effective housing land supply required by SPP. Some greenfield land will be required to maintain an effective supply.

Northbar, Erskine

3. North of Inchinnan and east of Erskine, a wedge of designated green belt provides an undeveloped area between protruding residential developments. This wedge includes Northbar house and its grounds, and a locally designated site of interest for nature conservation at Teucheen Wood. The proposed site would avoid these assets but otherwise take up the agricultural land between them and the built up areas. However well designed and landscaped, the introduction of significant built form and associated infrastructure, would remove the open and natural character of the site as it is.

4. However, the eastern expansion of Erskine became coalesced with Inchinnan some time ago. There is now no separation between them. To my mind, development of the proposed site would round off development on the west of the residential area, while appearing as only a small visible extension to the built up area from viewpoints across the remaining green belt. Although it would make a dramatic difference at a local level, in terms of the overall perception of the green belt, the change would be small in comparison to the potential housing that could be delivered. At the same time the existing woodlands and grounds around Northbar House would relieve the further residential spread (and also protect the setting of the listed building there).

5. The council does not dispute that the proposed site would be sustainable and deliverable. I see no reason to disagree and, with my findings above, I conclude that it should be included with the additional land allocated in the proposed plan.

Southbar/Linburn, Erskine

6. Linburn and Graigend estates currently form the extent of suburban Erskine, north of the Old Greenock Road. South of that road and within the designated green belt, the proposed site would introduce a potential 720 or so homes, a food store, local shops and potentially a new primary school.

7. The green belt currently has a strong boundary along the Southbar and Old Greenock Roads. That would be replaced by a boundary largely following existing woodland and watercourses. Some parts of the proposed boundary would be less strongly defined, but these could be reinforced over time with tree planting. More significantly, however, a significant swathe of land would be removed from the green belt. I note that landform, existing vegetation and man-made structures would filter views of development here. Even so, the impact on the green belt would be visible from parts of the M8, the surrounding road network and nearby places. That could be softened over time by adding woodland planting to the existing tree belts around Southbar steading and along Southbar Road, but the physical loss of green belt would be clear to those using the area

for recreation or appreciating the current openness of the land.

8. The proposed development would take up around 67 hectares of the green belt, without delivering a proportionate number of houses in the early years of the proposed plan, when the shortfall in effective land is most acute. Further, I agree with the council that there could be an impact on delivery at the Community Growth Area at nearby Bishopton, contrary to the focus of the plan on developing brownfield land in preference to greenfield. This is partly because assessment of the effectiveness of this site includes commitment from builders also actively engaged at Bishopton.

9. I note that there is general agreement that the site is sustainable and it would provide some of the essential facilities for the scale of population it would house. It would also open up this area for public recreation with positive additions to the green network (a priority in the proposed LDP). Nevertheless, the impact on the green belt here is too great in my opinion to release this land at this time.

Reporter's recommendations:

Add the site at Florish Road, Northbar, Erskine to Schedule 2 of the proposed plan as a green belt release and with an indicative capacity of 200 units.

Issue 29	Houston – Alternative Suggested Housing Sites	
Development plan reference:	None	Reporter: Ron Jackson
Body or person(s) submitting a representation raising the issue (including reference number):		
Elderslie Estates (12) Stewart Milne Homes (1883) Taylor Wimpy UK Ltd (2007) Persimmon Homes (West) Scotland (186) Mr Nugent (181)		
Provision of the development plan to which the issue relates:	Alternative suggested housing sites on land around Houston including Land to the West of 6 Houstonfield Quadrant, Land to the West of Barochan Road, Ardgyfe Crescent and Manse Crescent.	
Planning authority's summary of the representation(s):		
<u>West of 6 Houstonfield Quadrant (Site 2278)</u> <u>Elderslie Estates (12)</u> Elderslie Estates are in the discussions with Persimmon Homes with regard to this site. The site is capable of being developed within a 10 year period. It is accessible to the settlements services and there is potentially good access to the local green network. There are no significant access, flooding and drainage issues which would be a constraint to development. The development of this site would include advanced screen planting along the western boundary to ensure that the site will be visually contained and to provide a robust green belt boundary. This planting will ensure that this is a peripheral green field site suitable for development. <u>Persimmon Homes (West) Scotland (186)</u> The Council has failed to assess the submitted proposal for this site in an objective and accurate manner. This is an effective site which would be fully developed over the Local Development Plan (LDP) period. The location of the site adjacent to the existing built form on Houstonfield Quadrant and at Houstonfield House will provide the opportunity for infill development and settlement consolidation. It would accord with the LDP's Places Strategy providing around 150 homes within a landscape framework supportive of the LDP's Green Network objectives. The development would improve the quality and use of open space in this area. The site is in a sustainable location in terms of public transport and accessibility to the settlement's facilities and services. It is within walking distance of existing bus stops and the Core Path Network. The development of the site will integrate with the surrounding development, both existing and proposed to the north at the East of Fleming Road site and will enhance the settlement identity on the western edge of Houston through creating an attractive and varied edge to this site. The existing		

landscape has the capacity to accommodate development without impinging on the landscape setting of Houston. The development of the site also provides the opportunity to reposition and strengthen the existing green belt boundary in this location. The existing field boundary to the west of the site would be reinforced with new planting to provide a robust tree belt, clearly identifiable on the ground and relating to the existing physical feature of the Houstonfield Dam.

West of Barochan Road (Site 5014/ 2279)

Elderslie Estates (12)

Elderslie Estates are in discussions with Stewart Milne Homes (SMH) with regard to this site, and submissions have been made. The site is capable of being developed within a 10 year period. It is accessible to the settlement's services and there are no significant access, flooding and drainage issues which would be a constraint to development. Although located on an area of rising ground, the site is bounded by housing on two sides and has areas of woodland which will act as screening or buffers. These would be expanded to take account of the adjoining Scheduled Ancient Monument and War Memorial. With the benefit of screening to the north and west a robust green belt boundary will be provided. A suitable landscape strategy will ensure that this site can provide an acceptable extension to Houston.

Stewart Milne Homes (1883)

SMH previously identified the potential for two areas of development separated by the Houston Burn and a steep, wooded embankment. While the land east of Fleming Road (Ref, 2266) has been allocated for development in the proposed LDP the land west of Barochan Road has not been included as an appropriate addition to the green field housing land supply. SMH objects to this omission.

SMH has carried out additional appraisal work focussing on the landscape and visual context of the land west of Barochan Road. This has highlighted that there is scope for a limited westward extension of the Barochan Road site. A more cohesive layout across sites 5014/2279 and 2266 could be achieved with pedestrian linkages between the upper and lower sites if the site of the existing kennels at the north end of Fleming Road was to be incorporated. As a result this objection seeks allocation of a slightly larger site than has previously been promoted.

The current settlement edge formed by the development to the east of Barochan Road and south of Kilallan Road is unsatisfactory in visual terms. There would be positive merit in landscape and visual terms if a limited amount of sensitively designed development was to be permitted west of Barochan Road. This site has some capacity for development subject to appropriate mitigation measures and wouldn't cause an undesirable precedent leading to future development on other surrounding fields. The retention of all existing vegetation of merit and extensive areas of open space and a sensitive development layout can all combine to mitigate any potential adverse effects of the proposed development. Development as proposed would fit into the existing grain of development in Houston and would provide a clear, robust edge to the settlement – something that is currently lacking.

This is an effective site which would represent an appropriate opportunity to round-off the settlement in a manner that involves very little effect on the wider landscape. Existing

infrastructure in the surrounding area can be extended to serve the site and that there is no indication of any capacity issues. The site is physically capable of taking the form of development proposed. The site is also accessible by a range of means of transport. Development as proposed would have no strategic effect on the remainder of the surrounding greenbelt. Furthermore, housing development on any other potential sites around the village can be expected to result in significantly greater impact than this proposal.

Rhubarb Farm, Ardgryfe Crescent (Site 5021)

Taylor Wimpy UK Ltd (2007)

Taylor Wimpey owns the entire site and is therefore in the position to have planning restrictions placed on the extent of development. It is noted that the independent landscape assessment (CD/08) carried out on behalf of the Council concludes that a limited level of development to the west of the site adjacent to Ardgryfe Road could be managed in the context of additional planting. These comments and the Final Site Assessment for this site as detailed in the Housing Land Requirements Background Paper (CD/41) have been fully considered and Taylor Wimpey are willing to reduce the proposed site significantly to accommodate the council's concerns relating to the setting of Houston and precedent. The new site to the western side of the fields could accommodate approximately 50 houses and would be set in the landscape. This is an available and effective site which could be developed over the plan period and there are no significant constraints to development. Development could provide access and additional linkages to the green network. The site would physically adjoin Houston and development would provide an opportunity to create a natural long term defensible and clearly definable settlement edge through significant planting and maintained open areas. The site can be integrated with the existing settlement and within the landscape providing a greenbelt setting on the remaining land.

Manse Crescent (Site 0030)

Mr Nugent (181)

No provision is made in the Proposed LDP for housing for the elderly in Houston. The current designation of this site within the proposed LDP for amenity use is inappropriate as there is sufficient amenity space within the village. This site should be utilised for a flatted development for elderly people.

Modifications sought by those submitting representations:

The site to the West of 6 Houstonfield Quadrant should be added to Schedule 2 of the LDP as a green belt release site. (12)

The site to the West of 6 Houstonfield Quadrant should be added to Schedule 2 of the LDP as a green belt release site for 150 units. (186)

The site to the west of Barochan Road should be added to Schedule 2 of the LDP as a green belt release site. (12)

The land west of Barochan Road (including the existing kennels site) should be added to the list of additional housing sites in Schedule 2 of the LDP with an indicative capacity of around 70 units. (1883)

This Rhubarb Farm site at Ardgryfe Crescent should be added to Schedule 2 of the LDP as a green belt release site for 50 units. (2007)

The site at Manse Crescent should be identified as an additional housing site providing a flatted development for elderly people. (181)

Summary of responses (including reasons) by planning authority:

Land to West of 6 Houstonfield Quadrant

Elderslie Estates (12)

It is agreed that this site could be developed within the period of the plan and that there are no significant constraints to implementing residential development at this site. However, this site is a sensitive area of green belt land which contributes to protecting the overall landscape setting in this part of Houston. Furthermore, it is in a prominent location beyond the natural limits of the settlement with a lack of containment in the landscape which means that it is inappropriate for development.

Persimmon Homes (West) Scotland (186)

The Council has openly and transparently assessed the relative merits of proposals that were submitted for this site at the various stages in the LDP process. The Council assessed the implications of development on this prominent green belt site and it was considered that any housing positioned on this site would be highly visible and obtrusive in the landscape, changing the visual profile of the area. Although a landscape framework is proposed, it is insufficient to justify its allocation for residential use. The development would take away an area of open and natural green environment and replace it with a more formal, built form. While land to the north (Suggestions for Land Use Change Ref, 2266) has been allocated for residential development in the proposed LDP, this site has a completely different landscape form and surroundings to the site at Houstonfield Quadrant and comparisons cannot be drawn. The location of the site, outside the village envelope but adjoining the existing residential area could be justified if integration with the surrounding built form could be achieved. However it is considered that the existing built form surrounding the site prevents this from happening and therefore the site could not be properly integrated with the rest of the village. The site would simply be an add on to the existing village. Given the lack of containment at this site, development would constitute a spreading of the built-up area into sensitive green belt land to the detriment of this part of Houston. The existing green belt boundary may be uneven formed along the line of rear gardens, however, through time this boundary has become well established in the area. This remains a more effective, recognisable and defensible boundary than the proposed planted line which would take time to mature and become established. It is important that this established and defensible boundary is retained to prevent development spreading to the fields to the west.

It is agreed that this is an effective site in a sustainable location in terms of access to public transport and access to the settlement's facilities and services. However, for the

reasons outlined above it considered that development of this prominent site would fail to make a positive contribution to the settlement, would make the green belt boundary less defensible and will therefore remain zoned as green belt.

Land to West of Barochan Road

Elderslie Estates (12)

It is agreed that this site could be developed within the lifetime of the plan and that there are no insurmountable constraints to the development of this site. However, this site is a sensitive area of green belt land which contributes to the green backdrop to the village which protects its landscape setting. Furthermore it is in a prominent location which is highly visible at the northern entrance and exit to the village which would form an unwelcome intrusion to the overall setting of the village.

Stewart Milne Homes (1883)

The proposed westward extension of the Barochan Road site to include the existing kennels at the north end of Fleming Road has been submitted too late in the process and has not been fully assessed. While this expansion would aid integration between this site and site 2266, East of Fleming Road, this does not merit the site to the west of Barochan Road being identified as an addition housing site in the LDP and these sites should remain separate.

It is agreed that this site could be developed within the lifetime of the plan and that there are no significant constraints to implementing residential development at the site. However, in identifying suitable sites for green belt release in the proposed LDP, the council aimed to provide sites which could integrate well with the surrounding area, appear as part of the settlement, not just an add-on to the existing built up area. Sites were not chosen as they simply rounded-off settlement. To provide a positive addition to the existing place, the Council identified sites which are well connected with the existing built form. We do not consider that this site can successfully achieve this particularly with very little effect on the wider landscape as suggested. The independent landscape assessment (CD/08) conducted on behalf of the council concluded that this site is not suitable for development as it is in prominent location which is beyond the natural limits of the settlement and is part of an area of open landscape. While various measures could be adopted to try and mitigate the potential adverse effects of the proposed development this proposal would ultimately have a detrimental impact on the landscape and the wider setting of the area and the character of this part of Houston. The proposed development would be undesirable as it would be detrimental to the landscape setting of this part of Houston and would fail to make a positive contribution to the settlement. This site will therefore remain zoned as green belt.

Rhubarb Farm, Ardgyfe Crescent (2007)

It is noted that this site has been reduced in size and is now limited to the western side of the fields with an indicative capacity of 50 units. It is agreed that this site could be developed within the lifetime of the plan and that there are no insurmountable constraints to the development of this site. The independent landscape assessment (CD/08) conducted on behalf of the Council concluded that this site screens and provides containment to the settlement, even development along the western edge of the site could breach this high point and have a negative impact on the setting and character of

the green belt. For these reasons the site was considered to be unsuitable for development. Although possible mitigation measures were suggested which have been reflected in the revised submission it is considered that this site would not fully integrate with the existing settlement and the proposal would have an impact on the landscape and the wider setting of the area constituting a spreading of the built-up area into sensitive green belt land to the detriment of this part of Houston. The green belt boundary in this area is well defined by Ardgyfe Crescent. This remains a more effective, recognisable and defensible boundary than the planted line shown on the indicative plan and for these reasons it is important that this clear and defensible boundary is retained to prevent development spreading to the fields to the east.

For the reasons outlined above it is considered that such development would be undesirable as it would form an unwelcome intrusion in the landscape and would not make a positive contribution to the settlement. Furthermore, there are more suitable brownfield and green belt sites within Houston which have been identified to meet the housing need in this area. This site will therefore remain zoned as green belt.

Manse Crescent (181)

The site at Manse Crescent has not been identified as an additional housing site. It is considered that there are other sites for housing identified within Houston, brownfield and within the green belt that are more appropriate for residential use than this site. A site in the green belt is proposed to the north east and could accommodate a residential development for the elderly. While it is agreed that there is a considerable supply of open space within Houston, it is considered that retaining this piece of amenity space provides communal open space for the residents on all three sides of the site. The Policy P1 zoning is appropriate for this area of green space in the middle of the settlement. It is not required for residential development and it is not considered appropriate to identify this site as an additional housing site within the proposed LDP.

Reporter's conclusions:

General

1. As stated in the conclusions in the report on Issue 17, the proposed plan does not identify sufficient land on a range of sites which are effective or capable of becoming effective to meet the housing land requirement up to year 10 from adoption, ensuring a minimum of 5 years effective land supply at all times. Further sites will therefore need to be identified. This can be achieved by the council producing supplementary guidance.
2. In 2012 the council undertook a strategic review of the Renfrewshire green belt (CD49) as part of the preparation for the plan. The council has openly and transparently assessed the relative merits of the various development options which were available. I therefore place considerable weight upon the findings of this review. A number of sites in the green belt in and around Houston have been proposed for development by various parties. These sites are considered below.

Land to west of 6 Houstonfield Quadrant

3. This site comprises part of an open, gently undulating arable and grazing field in a prominent location on the western edge of Houston. It is triangular in shape, tapering almost to a point at the southern boundary. The eastern boundary is formed by the rear

gardens of the settlement and to the north lies a mature woodland belt enclosing a substantial detached property. That provides clear separation between this site and the allocated housing site at Fleming Road.

4. The western boundary of the site is open and follows no topographical features. It is simply a line across the existing field. The site is completely open to the west with no containment whatsoever. Development of the site would not constitute infill development but rather an extension of the built settlement into open and attractive countryside. SPP makes clear (paragraph 162) that green belt boundaries should be clearly identifiable on the ground, using strong visual or physical landscape features such as rivers, tree belts, railways or main roads. The north and east boundaries of this site provide a well established green belt boundary. Although it is proposed to provide a tree belt along the western boundary of the site, a strong and effective green belt boundary as envisaged by SPP would take a long time to establish.

5. Based on my observations at the site and in the surrounding area, I am satisfied that development of this prominent site would result in an unwelcome intrusion into open countryside and would impact adversely upon the landscape setting of the settlement. The council's green belt review has also found this site to be unsuitable for residential development. I accept that the site is in a sustainable location in terms of public transport and accessibility but that is insufficient to overcome the problems identified above. For the foregoing reasons and for the reasons set out in paragraphs 1 and 2 above, development of this green belt site cannot be supported.

Land west of Barochan Road

6. This land is made up of two sites (5014 and 2279). It comprises three irregularly shaped fields lying to the north of the settlement. The two fields on the northern part of the site are gently undulating open grazing fields, while the third field in the southernmost part of the site contains some shrub vegetation and woodland and slopes fairly steeply southwards towards the settlement. There is a fairly new woodland planting belt along the northern boundary of the site and in the western part of the northernmost field is another area of shrub vegetation. The two fields forming the upper part of the site, which are intended for housing development, are generally open and prominent from many directions. To the north of the site there are similar open, undulating arable and grazing fields and to the east lies Barochan Road and the dwellings beyond.

7. The council's assessment of the two sites shown in CD06 indicates that the two northern fields intended for development are prominent and outwith the established settlement boundary. The assessment also indicates that development would have a negative effect of the setting of the conservation area to the east. The fields are part of the open undulating farmland landscape character to the north and east of the settlement and therefore not suitable for development.

8. Based upon my observations at the site and in the surrounding area I find that the current settlement boundary is not unattractive in visual terms and that Barochan Road forms a fairly robust green belt boundary. The proposed development site is in a prominent location and is highly visible at the entrance to the village and from the surrounding area. Development of the northern part of the site in particular would impact upon the skyline. The proposal would extend the built settlement into open countryside with consequent adverse landscape and visual impact.

9. I have noted the most recent proposal to tie in development of this land with development of the existing kennels at the north end of Fleming Road. While such a proposal may have some merit in providing integration between this land and site 2266, that does not overcome the fundamental problems identified above. For all of the foregoing reasons, and for the reasons set out in paragraphs 1 and 2 above, development of this green belt site cannot be supported.

Rhubarb Farm, Craigends Road

9. This large 15 hectare site comprises open arable and grazing fields gently undulating to a high point in the eastern part of the site, which screens the settlement in longer views from the east. The site is similar in character to the open, undulating character of arable and grazing fields found to the east of Houston. There are established hedges to the north and east boundaries of the site. These provide very little containment as the land slopes upwards from the hedges. To the west the site is bounded by Ardgyffe Crescent with residential development beyond. To the south lies an established woodland belt that provides a measure of containment. It is proposed to provide a development of some 50 dwellings on the western part of the site, with additional planting to form a new green belt boundary to the east of that new development.

10. The eastern boundary of the proposed development site is open apart from a few mature trees. As already stated, SPP makes clear that green belt boundaries should be clearly identifiable on the ground, using strong visual or physical landscape features such as rivers, tree belts, railways or main roads. In my opinion, Ardgyffe Crescent provides a strong and well defined green belt boundary. Although it is proposed to provide planting along the eastern edge of the development site, a strong and effective green belt boundary as envisaged by SPP would take a long time to establish.

11. The landscape assessment carried out for the council by Ironside Farrar (CD08) identifies this site as sensitive and not suitable for development. The council's assessment of the site shown in CD06 states that the majority of the site is highly visible and prominent when approaching the settlement from the east. The site screens and provides containment to the settlement and even development along the western edge of the site could breach this high point and have a negative impact on the setting and character of the greenbelt. From my own observations at the site and in the surrounding area I agree with these findings.

12. The proposed development would simply extend the existing settlement into highly prominent open countryside with consequent adverse impact on the landscape and the setting of this part of Houston. For the foregoing reasons and for the reasons set out in paragraphs 1 and 2 above development of this prominent green belt site cannot be supported.

Manse Crescent

13. A site has been allocated for residential development immediately to the east of Manse Crescent. There is therefore adequate housing land available to meet any identified local need for housing for the elderly. The Manse Crescent site is grassed and well maintained. It is currently used as amenity space. In view of this, the site should remain as communal open space for local residents.

Reporter's recommendations:
No modifications.

Issue 30	Howwood – Alternative Suggested Housing Sites	
Development plan reference:	None	Reporter: Philip Hutchinson
Body or person(s) submitting a representation raising the issue (including reference number):		
PPA Ltd (76) Mactaggart and Mickel (Homes) Ltd (1801)		
Provision of the development plan to which the issue relates:	Alternative suggested housing sites on green belt land around Howwood including site north of Beith Road, Site north of Midton Road, site at Elliston, site west of Linister Crescent, and Former Bleach works at Midton Road	
Planning authority's summary of the representation(s):		
<p><u>PPA Ltd (76)</u></p> <p>Former Bleach Works, Midton Road, Howwood</p> <p>Request that the site is identified as a housing allocation under policy P3 and Schedule 1 in the plan and on the proposals map.</p> <p>Planning permission (CD/52) exists for residential use on a portion of the site. Failure to allocate the site as effective land will create uncertainty if the planning permission lapses or requires to be amended and the uncertainty regarding the parts of the identified site which are not covered by the planning approval as the site offers a redevelopment opportunity in the Green Belt.</p> <p>Consider it very unsatisfactory that the LDP will not acknowledge in any way that the site with the ability to provide around 30 housing units is not designated as such in the Local Development Plan.</p> <p><u>Mactaggart and Mickel (Homes) Ltd (1801)</u></p> <p><u>General Additional sites proposed in Howwood</u></p> <p>The sites are located to the north east and south west of Howwood and represent a significant opportunity to establish the sustainable growth of the settlement.</p> <p>The village is well connected by road and public transport and is considered to be a sustainable location where new development can be accommodated in a sensitive manner.</p> <p>There has been limited modern development in the area in recent times and investment in the housing stock and associated infrastructure should be welcomed.</p>		

Howwood links into the Green Network and if the development sites were taken forward they would like to renew existing footway provision through the village and ensure safe crossing points are identified. The village would benefit from additional households as this will help encourage existing bus and train operators to provide services with greater frequency.

A review has been undertaken of existing utilities infrastructure and of the potential constraints to development including biodiversity, archaeology and flooding. No constraints have been identified.

The sites are effective and deliverable.

Site north of Beith Road and Site north of Midton Road

Both sites are located to the east of village and have development potential to be sustainable and logical extension to Howwood.

The developer would create a new neighbourhood that reflects local architectural character achieving high design principles and promoting sustainable transport.

The development would include provision for open space and where required other community facilities.

Site at Elliston and Site west of Linister Crescent

Development of two sites to the western edge of Howwood offers an opportunity for sustainable residential development within the Hollow in the Wood.

It would represent a sustainable extension to the settlement that can be developed to reflect existing topography, building upon the current landscape character of the area, taking advantage of the excellent views across the valley.

A modern permeable design led development can be achieved with existing wildlife habitats conserved and walking and cycling access and links to the wider countryside and Core Path network enhanced.

Development will include re-enforcement of the green edge to the settlement, providing a defensible boundary.

Modifications sought by those submitting representations:

PPA Ltd (76)

Former Bleach Works, Midton Road, Howwood

Add the following text to Schedule 1 – Midton House, Midton Road, Howwood – 30 units – redevelopment opportunity in the green belt. Proposals Map F – delineation of the site under the P3 – Additional Housing Sites indication.

<p><u>Mactaggart and Mickel (Homes) Ltd (1801)</u></p> <p>Inclusion of the additional housing land in Howwood. To meet housing demand, or if other sites proposed for development are inappropriate that Howwood would be a sustainable and suitable location for further housing than is currently proposed in the Local Development Plan.</p>
<p>Summary of responses (including reasons) by planning authority:</p>
<p><u>PPA Ltd (76)</u></p> <p><u>Former Bleach Works, Midton Road, Howwood</u></p> <p>This site is nestled amongst a cluster of houses in the middle of the green belt. Almost all of the residential units are individually designed with a reasonable amount of land surrounding each plot.</p> <p>The council recognise the fact that the site has planning consent for residential use by including the site within Schedule 3 – Renfrewshire’s total housing land supply. It would not be appropriate to identify this site under Policy P3 given that it is not a proposal for additional housing above and beyond what has already been identified in the total housing land supply.</p> <p>It is also not appropriate to identify the site as Policy P1 – Renfrewshire’s Places given the site’s location in the green belt which is quite separate from any settlement or built up area. The green belt designation does not restrict appropriate development and as planning consent (CD/52) has already been granted we have accepted this land use in the green belt. We therefore propose, the above sites will not be rezoned as residential but will remain zoned as green belt.</p> <p><u>Mactaggart and Mickel (Homes) Ltd (1801)</u></p> <p><u>Site north of Beith Road (SLUC Ref 5054 - 3) and Site north of Midton Road (SLUC ref 5054-2)</u></p> <p>Both sites are open undulating grazing fields located on the eastern entrance and exit to the settlement. Allowing development of these sites would protrude into and reduce the farmland buffer between Howwood and Johnstone. Development for housing would change the landscape character and the visual profile of the area, forming an unwelcome intrusion in the landscape at the edge of the village. It is agreed that the both sites could be considered as sustainable in that Howwood has both rail and bus provision. However in terms of a logical extension, it is considered that the development would be outside the village envelope, beyond a clear strong settlement and defensible green belt boundary which is unacceptable.</p> <p><u>Site at Elliston (SLUC ref 5054 - 5)</u></p> <p>This site is highly visible in the landscape given its topography and elevated position at the western end of the settlement. The site is considered to be part of the green back drop to the village which contributes to its landscape setting. The site is considered to be sustainable given the proximity to public transport and other facilities, however it is not the most appropriate location as an extension to the village. Although it appears to be</p>

rounding of the village, on the ground the development of this site would be disjointed and unconnected from the rest of the settlement given the existing built form. Therefore would appear as a bolt on to the village rather than forming a cohesive relationship which is seen in the existing layout of the settlement. Development would be undesirable and should not be rezoned as residential but remain zoned as green belt.

Site west of Linister Crescent (SLUC REF 5054 - 4)

This grazing field at the western extremities of the settlement has an undulating form and therefore parts off the site are prominent and visible in the landscape whereas other part of the site are not visible due to landform and boundary treatment. Therefore development would not be significantly detrimental in the visual profile of the area. Development of this site would simply extend ribbon development on this side of the road, spreading out the settlement built form rather than consolidating and strengthening the existing place. Altering the land use zoning of this site is not considered appropriate or a positive benefit for the settlement.

PPA Ltd (76) and Mactaggart and Mickel (Homes) Ltd (1801)

In conclusion, the council continues to support the spatial strategy in the proposed LDP and do not propose to rezone any of the above sites as residential and they will remain zoned as green belt.

Reporter's conclusions:

Former Bleach Works, Midton Road

1. When granting planning permission for housing on this site the authority accepted that the conversion and redevelopment of the existing buildings would not contravene green belt policy. 41 units were envisaged at that time, despite the present representation seeking only a 30-house allocation. Elsewhere a 20-house allocation has been suggested. The highest of these numbers forms part of the effective housing land supply from the 2012 Housing Land Audit, as recorded in Schedule 3. This would not be an addition to the housing land supply. Accordingly this site cannot be covered by Policy P3 – Additional Housing Sites, and it cannot belong in either of Schedules 1 or 2.

2. The perceived future uncertainty should planning permission lapse has been exaggerated. It is clear that the site is part of the already effective housing land supply, and that the authority is content for it to be developed in a way which will respect the historic interest of the existing buildings and their landscape setting within the green belt. These points should represent sufficient reassurance for any potential developer or others with an interest in this property.

3. I consider the site represents a reasonable redevelopment opportunity in the green belt. Green Belt policy coverage should continue to 'wash over' this site.

Sites north of Beith Road (ref: 5054-3) and north of Midton Road (ref: 5054-2)

4. The development of these sites, individually or together, would represent a significant intrusion into the green belt. This would extend beyond the defensible and logical green belt boundary which should result from the release of the site covered in Issue 21 (ref: 5054.1). The release of either site would reduce the separation of Howwood and

Johnstone, and be very regrettable in landscape terms. Each site is apparently constraint-free. However the release of neither can be justified in this somewhat off-centre location despite the state of the overall housing land supply (from Issue 17). Nor can it be justified given the potential scale of development from (a) the provisionally allocated site north of Midton Road and (b) the former Bleach Works.

Site at Elliston (ref; 5054-5)

5. The steep, elevated and particularly peripheral nature of this site severely limits the case for its release for housing development. I agree that it is highly visible in the landscape. It is part of the green-backdrop to the village and is therefore very important to its landscape setting. It would be impossible to undertake development on this site in a way which would satisfactorily integrate with the village. It would effectively become a separate environmental area.

6. This is also the largest of all the sites under consideration at Howwood. In this additional respect its release cannot be justified given the off-centre location of this village despite the overall housing land supply situation (from Issue 17). The two other local opportunities identified above are commensurate with the scale of this village.

7. I consider this site to be among the weakest candidates for development within the plan period. This is consistent with, and largely influenced by, the terms of the landscape assessment undertaken on behalf of the authority.

Site west of Linister Crescent (ref; 5054-4)

8. This attractively situated site is exposed to view from Beith Road (B787) and even more so from the A737 near their junction at the west end of the village. The boundaries are not universally open however. This undulating site sits quite low in the landscape. However, its release would represent a form of ribbon development in a distinct salient reaching as far as the above junction. This would be well outside the presently defensible green belt boundary at this end of the village. As it stands the site contributes positively to the village entrance. The site accordingly scored very poorly in the landscape assessment undertaken for the authority.

General approach to housing land allocations at Howwood

9. The allocated site north of Midton Road (30-50 units) covered under Issue 21 represents a proportionate and reasonable level of provision over the plan period, with or without development at the former Bleach Works. Despite the overall land supply picture (from Issue 17) I consider there is no sound case for additional allocations in the form of the above suggested alternatives. These in any case occupy more peripheral and exposed positions. Each alternative would involve significantly greater adverse environmental impacts. The former bleach works forms part of the already effective housing land supply. It can - and should be - redeveloped without removing the site from the green belt.

Reporter's recommendations:

No modifications

Issue 31	Johnstone – Alternative Suggested Housing Site	
Development plan reference:	None	Reporter: Philip Hutchinson
Body or person(s) submitting a representation raising the issue (including reference number):		
Granite Properties (1817)		
Provision of the development plan to which the issue relates:	Alternative suggested housing site on green belt land at Milliken Park, Johnstone	
Planning authority's summary of the representation(s):		
<p><u>Granite Properties (1817)</u></p> <p>Promotion of 0.57ha (1.4 acre) site (Site Ref. 0060) located on the corner of Cochranemill Road and Milliken Park Road in Johnstone for development of 2 to 3 houses. The scale of development proposal has been reduced so as to address Council concerns regarding development of the site.</p> <p>The site does not maintain the identity of settlement, protect and enhance the landscape setting of an area or promote access opportunities to open space, therefore, it should not be classified as greenbelt policy ENV1.</p> <p>The biodiversity value of the site has been overstated and it is considered that the SINC designation has more relevance upstream and downstream. The site should therefore not be designated as a SINC and considered under Policy ENV2.</p> <p>Roadside visibility for drivers emerging into Cochranemill Road has been improved by clearing the vegetation. It is proposed that a footpath would be introduced on site to increase public access to the remainder of the SINC. The flood risk associated with 2 or 3 houses has been overstated. The footpath is proposed to be along the river bank where flood risk has been identified, mitigation could be ensured through planning conditions. The allocation of this site would increase the range and choice of housing sites on offer as there are no sites of less than 3 houses identified in the latest Housing Land Audit (CD/38).</p>		
Modifications sought by those submitting representations:		
<p>Map F to remove SINC designation from at least our 0.57ha (1.4 acre) site at the corner of Milliken Park Road and Cochranemill Road and to remove the strategic Green Belt designation of the narrow strip of land at Milliken Mill Road, in particular our site up to the junction of Cochranemill Road with Kilbrachan Road just to the south of the Kilbrachan road junction on the A737 Johnstone bypass. Consequently to identify our site for small scale residential development for no more than 3 houses accessed from Milliken Park Road and to provide footpath access along the banks of the Black Cart. (1817)</p>		
Summary of responses (including reasons) by planning authority:		

Milliken Park (1817)

In the proposed Local Development Plan (LDP) Policy ENV1 – Green Belt states that ‘appropriate development within the green belt will be considered acceptable where it can be demonstrated that it is compatible with the provisions of the New Development Supplementary Guidance (SG) (CD/09).’ A small development of 2 to 3 houses on this site, which are appropriately designed; fit well in the surrounding landscape; and contribute to the place would be considered through the submission of a planning application. It is not considered necessary to take this small site out of the green belt.

Policy ENV2 - Natural Heritage states that ‘the council welcome any development which does not have an adverse effect on the integrity of sites protected for their natural conservation interest, which have the potential to protect and enhance designated nature conservation sites and the wider biodiversity of the area, and where appropriate, will seek to improve these resources.’ As above, criteria for the assessment of proposals within a Site of Importance for Nature Conservation (SINC) are set out in the New Development Supplementary Guidance (CD/09). A small development of 2 to 3 houses on this site, which are appropriately designed to not adversely affect the biodiversity interest; encourage species dispersal through habitat connectivity; ensure mitigatory measures are in place and do not have an adverse impact on protected species, would be considered through the submission of a planning application. SINC status should be retained on this site so as to ensure that these issues are addressed by any proposal which is brought forward.

Flood risk on site would require a Flood Risk Assessment to be carried out before the development of this site could be supported. Junction visibility, where Milliken Park Road meets Cochranemill Road, means that access is a considerable constraint for site. The effectiveness of this small site may be compromised by the above constraints, therefore a positive allocation as a housing site is not appropriate.

Reporter’s conclusions:

1. This small, densely treed corner site is part of a natural green corridor on the east bank of the Black Cart Water. This separates Millikenpark from Cartside and adds a sense of place. It would be visually unfortunate if its natural appearance, as well as its nature conservation interest, was to be swept away by housing development on a specifically allocated site.

2. I agree with the authority that a development of 2-3 carefully designed houses could still be accommodated without removing the site from the green belt. This need not endanger the well-treed characteristics, or nature conservation interest, of this strip of riverbank. The authority’s response is reasonable in every respect.

Reporter’s recommendations:

No modifications

Issue 32	Kilbarchan - Alternative Suggested Housing Sites	
Development plan reference:	None	Reporter: Philip Hutchinson
Body or person(s) submitting a representation raising the issue (including reference number):		
Church of Scotland Trustees (1810) Glentyan Estate (1864) Ms Ellen Rodman (1907) Kilbarchan Community Council (2012) AWG Property Ltd & CEMEX UK Property (2094)		
Provision of the development plan to which the issue relates:	Alternative suggested housing sites on Green Belt land at Kilbarchan.	
Planning authority's summary of the representation(s):		
<u>Church of Scotland Trustees (1810)</u> Object to a site at Kilbarchan Glebe, Kilbarchan (Ref. 5024) not being included as a residential development site. Access and flooding issues can be overcome providing a residential development site for up to 40 dwellings. Development would round off the western edge of the village, where the existing burn and core path on the western boundary forms a defensible boundary for the Green Belt. The site's development would have a minimal impact on the village's character and landscape setting, as well as the site's biodiversity and recreational value. No adverse impact would be caused on existing school provision.		
<u>Glentyan Estate (1864)</u> Object to a site at Mount Pleasant / east of Shuttle Street, Kilbarchan (Ref. 5002 & 2244) not being included as a residential development site. Through a masterplan process, which would consider a wider village strategy, the site would provide a new sustainable neighbourhood, located on the northern edge of the village but within 10 minutes walking distance of most local facilities, enabling potential improvements to the public realm, community and leisure facilities of the village. The opportunity also exists to enhance the northern Green Belt edge of the village. The site is effective, being free from physical constraints, and could be developed for up to 200 homes. The development could provide the catalyst for medium to long term inward investment in Kilbarchan.		
<u>AWG Property Ltd & CEMEX UK Property (2094)</u> Object to a site at Barrhill Crescent, Kilbarchan (Ref. 2240) not being included as a residential development site. The site is considered to be a suitable, sustainable and effective, providing up to 75 dwellings, and can be fully integrated into the village. The site would provide choice and flexibility to assist with future housing land requirements. The site, which is well contained, is a deliverable small scale opportunity, with low ecological		

value, that could be developed for housing without giving rise to any concerns about further settlement expansion. The Barrhill Crescent / Low Barholm road junction can be improved and it is not an impediment to development. Amenity and localised flooding issues can be addressed in the design of the development.

Ms Ellen Rodman (1907)

Object to a site at Milliken Road, Kilbarchan not being included as a residential development site. The site is isolated within the Green Belt following the granting of planning permission, on appeal, for a new dwelling at 10 Milliken Road in 1999. The triangular shaped site is bounded by Milliken Road, the A737 Johnstone by-pass and the dwelling house. The Council previously identified the land as an infill site and it should be zoned as housing instead of countryside.

Kilbarchan Community Council (2012)

Support the Proposed Plan and the protection given to the Green Belt surrounding the village of Kilbarchan. Support the rejection of applications to re-zone areas out of the Greenbelt (Refs. 2240, 2281, 5002 / 2244 and 5024).

Modifications sought by those submitting representations:

Include Kilbarchan Glebe as a housing site in the LDP and remove it from the Green Belt. (1810)

Include Mount Pleasant in the LDP for development. (1864)

Include Barrhill Crescent as a housing site in the LDP and remove it from the Green Belt. (2094)

Include the site at Milliken Road, Kilbarchan as a housing site in the LDP and remove it from the Green Belt. (1907)

No modifications suggested. (2012)

Summary of responses (including reasons) by planning authority:

Kilbarchan Glebe, Kilbarchan (1810)

It is considered that this site is not suitable for residential development, as it would be difficult to integrate and fully connect the development with the existing village. Although a connection could be provided from the north, there would be limited opportunity to link with the existing residential areas that adjoin the site to the east and south. The site has no frontage to existing streets and therefore it will have a limited relationship with the surrounding built form, contributing very little to place making within the settlement. It is agreed that many of the constraints associated with this site can be dealt with. However this will incur significant additional infrastructure cost associated with developing this site, particularly in relation to providing suitable vehicular access. This therefore questions the ability of the site to be delivered within 5 years and the site's effectiveness. It is agreed that, given its scale, school capacity exists to serve this development.

The site lacks containment in the landscape which means that development of this site is likely to lead to development spreading westwards along the fields. The independent landscape assessment report (CD/08) (by Ironside Farrar), prepared to inform the LDP Main Issues Report, rated this site as '1' which equates to 'sensitive, not suitable for development'. The site is only visible from the existing cycle path to the north, therefore, not highly visible in the landscape. However, the site is not considered appropriate for re-zoning as residential use, given the issues and concerns outlined above.

Mount Pleasant / east of Shuttle Street, Kilbarchan (1864)

The site is not suitable for residential development as it defines the boundary of the northern edge of Kilbarchan and it would have a significant impact on the existing landscape character, village setting and visual profile of the area. Although it may appear as a logical extension to the settlement, it is considered that development would go beyond the well defined village edge envelopment, defensible green belt edge which at present prevents development from spreading along the fields. Residential units on this site would appear as an add on to the settlement, with limited integration with the existing built form of the village and only one potential pedestrian connection to the existing access from Wheatlands Farm Road. This is a very prominent site which is highly visible and is considered to be part of the green backdrop to the village. The lack of containment in the landscape would make the green belt boundary less defensible with the potential to lead to further development of green belt land, which would be unwelcome.

Barrhill Crescent, Kilbarchan (2094)

It is agreed that this site is relatively sustainable, given its close proximity to the village facilities and services, as well as being adjacent to the existing cycle path. However, although the site adjoins the settlement to the western edge, we would not agree that it can be fully integrated into the village. The existing residential units, to the west and south, back onto the site and there is virtually no frontage development associated with this development. Although there are opportunities for footway connections, the relationship with the village would be very limited. This site is tucked into the back of the existing built form of the village and, therefore, it is difficult to see how there could be positive integration with the rest of the settlement. The site is very well contained and not overly visible. Therefore, it is agreed that the site could be developed without significant visual impact, however, it is considered that the development of this site would add little positive contribution to the sense of place. There are various issues associated with the development of the site, including levels, flooding and drainage concerns, as well as the ability to achieve appropriate access. These constraints, therefore, make effectiveness and deliverability of the site within the lifetime of the plan questionable. The site also contains a varied landscape with the potential for biodiversity, on which subject the supporting information 'Habitats Survey' was inconclusive, due to the time that the survey was undertaken. Given the uncertainty over the ability to deliver this site, as well as the lack of a positive contribution with the settlement, the site should remain zoned as green belt.

Ms Ellen Rodman (1907)

The site has been submitted late in the plan preparation process for it to be considered for inclusion into the proposed LDP. The site should have been submitted at either the Suggestions for Land Use Change stage, or Main Issues Report stage, in order to fully assess the site characteristics. However, it is considered that, given the approval of the

dwelling house adjacent to the site, residential development may be acceptable. The quickest route to testing this proposal would be through the submission of a planning application. The green belt designation should remain until further details are submitted and assessed.

Green belt surrounding Kilbarchan (2012)

The council welcomes the support of the Kilbarchan Community Council.

Reporter's conclusions:

1. Despite the position under Issue 17, I consider that a reasonably cautious approach is justified in relation to the possibility of additional sites in attractive villages such as Kilbarchan.

Kilbarchan Glebe

2. I agree that this greenfield site is, despite its strict proximity, isolated from the remainder of the village. This is on account of the orientation of houses to the south east and the availability of only one access route. This comes from the north underneath a former railway bridge. The associated former railway embankment strongly defines the northern boundary, running at higher level and carrying a cycle track. The site falls towards the potential access point in the north west corner where boggy ground predominates. A small south-flowing burn defines the west boundary. The topography plus the adjacent embankment both contain the site, yet separate it from the rest of the village.

3. The provision of a vehicular access appears unlikely to be straightforward on account of surface water both under the bridge, on either side of the burn and within the northwest part of the site. There is restricted headroom under the bridge, which is likely to become further restricted if a suitably drained estate road is to serve any development. I accept that alternative engineering solutions could resolve this problem (such as the replacement of the bridge with a lighter structure). Nevertheless at the present time one is left to speculate over how access with satisfactory headroom might be achieved.

4. Despite the apparently infill nature of this site when viewed on a map, it would be hard to satisfactorily integrate any housing development with the remainder of the village. Despite the overall housing land supply situation, I am not persuaded that the release of this site can be justified at the present time. It would be highly unlikely to be productive within the early years of the plan period.

Land at Mount Pleasant / East of Shuttle Street

5. I see no case for the release of this site (for the provision of approximately 200 houses) from the green belt at the present time. This is despite the position which has emerged under Issue 17. The site is elevated and reaches well outside the existing perfectly defensible green belt boundary. Its release would involve a lengthening of this existing green belt boundary, while relocating it at a higher altitude.

6. The development of this site would be arguably logical only in map form - and even then taking a very 'broad brush' approach. I agree that the site has no frontage to existing streets. I struggle to envisage how new housing development here - in a

completely separate neighbourhood - would integrate satisfactorily with the rest of the village.

7. I have considered all the arguments to the effect that the development could stimulate and partly fund various improvements to the public realm in Kilbarchan. However, I am unconvinced that the release of a peripheral greenfield site in the green belt (for about 200 houses) is a vital prerequisite and the only way that such improvements could be achieved. No mechanisms for the necessary cross-funding have been put forward. I have also considered the fact that such a large development could help sustain local services. However, it has not been demonstrated that any are under serious threat, or that this is necessarily the most appropriate site to release in pursuit of that objective.

Barrhill Crescent

8. This site is well-contained. Its development would give rise to no significant visual impacts, but for the need to carefully manage relationships with existing properties to its south.

9. Development appears unlikely to be straightforward, but I accept that drainage issues (in particular the management of surface water) may lend themselves to a solution which observes SUDS principles. I would be surprised if these issues could not be overcome somehow.

10. I agree that it would be harsh to describe the site as 'backland'. I can understand why that term has been used, but 75 new houses would not in my opinion amount to a classic form of backland development. That is conventionally taken to mean a second row of houses running loosely parallel behind frontage properties. However the site's very restricted road frontage gives rise to a serious concern especially when one takes the site's capacity to be about 75 houses. The objector argues that the site has enough frontage to Barrhill Crescent to accommodate a simple 'T' junction. It would have been helpful to have seen this demonstrated on a large scale drawing. A simple 'T' junction would in my opinion be much less than ideal. The eastward continuation of Barrhill Crescent serves roughly a dozen houses, whereas the arm of any 'T' junction - serving roughly six times as many properties - would end up carrying by far the greater level of traffic. A 'T' junction is not therefore the logical choice. A customised junction design would logically give turning traffic priority. This plus the potential land-take deserve further consideration.

11. I also have serious reservations about road layout and visibility at the junction of Barrhill Crescent with Low Barholm. Visibility to the left under the former railway bridge is presently substandard. I accept that the roads authority could trim back the offending vegetation, but there remains the need to relocate a switchgear cabinet. Even then it would be necessary to introduce centre-line markings in Low Barholm to ensure that oncoming traffic from the left only uses the far lane. This all requires further thought. I would have needed a drawing of a specific solution.

12. Moreover Barrhill Crescent has the *appearance* of an un-adopted road. It may conceivably be adopted, but the written submissions do not give me confidence in this. In parts it is lacking in footpath provision, and in others the footpaths are substandard. The carriageway varies in width. Street lighting and road drainage appear likely to require improvements. There is no turning area at present, and the road surface leaves much to be desired. The resolution of all these issues may very well impinge on the rights of

others, conceivably involving land in third party control. I cannot close my mind to such uncertainties. In the light of the above points I consider that off-site road works need much more consideration, in much greater detail, before this particular site can reasonably be allocated for housing development. At present I am not sufficiently confident that this site would become effective within the life of the plan.

13. Despite the background picture (from issue 17) I cannot close my mind to the possibility that small windfall sites may in all likelihood crop up elsewhere in the village. The release of this site for housing cannot presently be justified.

Ms Ellen Rodman

14. This site occupies an exposed position north of the A737 slip road by which traffic leaves Kilbarchan to head east. To its east, in a more enclosed situation, a modern house has been constructed following approval on appeal in 1999.

15. The authority accepts that the objection site might conceivably accommodate some development, and that this should be tested in a planning application rather than removing the site from the green belt. I agree, but consider that if modest development is to proceed it should be in conjunction with tree planting and landscaping to preserve a semblance of green space in this conspicuous location. Such considerations do not justify any change to the proposed plan.

Reporter's recommendations:

No modifications.

Issue 33	Alternative Site - Langbank	
Development plan reference:	none	Reporter: Philip Hutchinson
Body or person(s) submitting a representation raising the issue (including reference number):		
Alex McCallum (2067)		
Provision of the development plan to which the issue relates:	Alternative suggested housing site on green belt land near Langbank.	
Planning authority's summary of the representation(s):		
<u>Alex McCallum (2067)</u> Proposal for development of 4.72ha of land to the south of Main Road (the B789), Langbank, (Site Ref. 5053). The proposal was submitted to Main Issues Report (CD/05) in support for development as a residential care home, the points raised should be reconsidered. In terms of general development potential, the proposed site is deliverable and unconstrained. The site includes the remains of the Eastbank Hotel and should be considered to be brownfield. The perceived physical obstacles to development, such as: traffic and pedestrian safety issues; integration with the settlement; and impact on landscape setting, could be overcome. The landscape proposals and management could provide an enhancement to the location. The site promotes a sustainable use of land which when applied on a larger scale could help to save on further uptake of green belt land for housing. The site is also sustainable in terms of public transport provision. The approach to the green belt is overly restrictive and should not automatically rule out sites such as this. All sites should be considered on their individual merits when a planning application is submitted.		
Modifications sought by those submitting representations:		
Site should be allocated for a residential care home and not be retained within the greenbelt. Green belt policy should not automatically rule out developments such as this one. (2067)		
Summary of responses (including reasons) by planning authority:		
<u>East Bank, Langbank (2067)</u> The site forms part of a defined settlement boundary to the east of Langbank. The grounds of the former Eastbank House, provide an attractive landscape setting at the edge of the village and are of a high visual quality. There may be a very limited opportunity for development within the site on the footprint of the existing building and outhouses. Development on this footprint which is appropriately designed; fits well in the surrounding landscape; and contributes to the place would be considered through the submission of a planning application. The protection afforded by the green belt policy		

<p>ENV1 is such that the important landscape characteristics of the site continue to be protected; it is rejected that this amounts to “overburdening blanket protection”. Removal of this site from the green belt is undesirable because of the important landscape feature and strong settlement boundary that the site provides. For the above reasons it is not considered appropriate to remove the green belt protection from this site.</p>
<p>Reporter’s conclusions:</p> <p>1. The site has substantial tree cover, not merely defining its boundaries but also comprising major groups within. The extensive wooded policies contribute strongly to the landscape setting of Langbank on its eastern edge. The site therefore fulfils an important green belt objective. I agree that the building group in the centre of the site may have some development potential. This is provided that any development is restricted to the approximate footprints of existing buildings. Only to this extent can the site be said to have brownfield characteristics. The rest of the site is greenfield in nature.</p> <p>2. However I consider that any potential development is also seriously constrained by the poor standard of road access which is available. This is severely limited by the presence of the railway. Moreover I see no obvious scope for upgrading the access to a standard which could suit significant levels of development. Access possibilities have been closed off to the west of the site. Seath Avenue, Douglas Avenue and Station Road are residential cul-de-sacs, with houses having been built in ways which deny scope for extending these streets into the site. As one drives down each street, mature trees form attractive backdrops.</p> <p>3. The level of any acceptable development is likely to be determined by future traffic generation, relying mainly on the existing layout, and the extent to which it might rise above the baseline position. I agree with the authority that alternative futures for the centre of the site, focusing on the footprints of Eastbank House and its outbuildings, are more appropriately examined in detail by the submission of a planning application. This seems likely to justify further pre-submission dialogue. It is important to retain the site within the green belt, but this need not rule out some appropriate re-use of the buildings or their footprints in the centre of the site. In other words I agree fully with the authority’s response above. The wider housing land supply situation cannot override this site’s serious constraints.</p>
<p>Reporter’s recommendations:</p> <p>No modification</p>

Issue 34	Linwood – Alternative Suggested Housing Site	
Development plan reference:	None	Reporter: Dannie Onn
Body or person(s) submitting a representation raising the issue (including reference number):		
Dawn Group Limited (33)		
Provision of the development plan to which the issue relates:	Alternative suggested housing site on green belt land near Linwood, Barbush Farm North.	
Planning authority's summary of the representation(s):		
<p><u>Dawn Group Limited (33)</u></p> <p>Barbush Farm North (Site Ref. 5018) is an 11.9 Ha site proposed as suitable for residential development so as to facilitate access to the allocated housing site at Barbush Farm (South) (Site Ref 5061). The role and function of the green belt in this area has been diminished due to recent developments and proposals. This proposal would represent an effective rounding off of Linwood that would result in a more clearly defined and therefore more robust green belt. Development would also provide opportunities for the environmental enhancement of the area.</p> <p>Development of this site would not have an adverse effect on the character, landscape setting and identity of Johnstone, Linwood or Brookfield. There is no risk of coalescence between Johnstone and Linwood and the identity of Brookfield would not be comprised.</p> <p>Investment in housing within the settlement in addition to that proposed will contribute to regeneration. The site is very accessible and would benefit from and contribute to the enhancement of existing facilities in the area. The site is effective in terms of PAN (CD/42) advice.</p>		
Modifications sought by those submitting representations:		
It is recommended that in the context of Proposed Policy P3 - Additional Housing Sites that Barbush North be added to Schedule 2 - Additional House Sites - Greenfield. (33)		
Summary of responses (including reasons) by planning authority:		
<p><u>Barbush Farm North (33)</u></p> <p>The site is a large grazing field between Linwood and Johnstone, it is not suitable for development due to its prominence, the lack of containment and it would protrude into and reduce the farmland buffer between the settlements of Brookfield and Linwood. Development of this site would result in the loss of a defensible green belt boundary and</p>		

could result in more fields to the west of this site being put under development pressure. It is accepted that the site is accessible to existing facilities, services and public transport links. However, given the location of the site it would be difficult for any development of this site to fully relate to either Linwood or Johnstone, therefore, it would unlikely to be a positive addition to either settlement.

Reporter's conclusions:

1. As stated in the conclusions in the report on Issue 17, the proposed plan does not identify sufficient land on a range of sites which are effective or capable of becoming effective to meet the housing land requirement up to year 10 from adoption, ensuring a minimum of 5 years effective land supply at all times. Further sites will therefore need to be identified by a review of housing land supply. I have therefore assessed the site under this issue on its individual merits.
2. The strategy for the proposed plan is to focus development on brownfield sites in preference to greenfield. However, the brownfield and other urban land suitable for residential development will not meet the housing need and demand, nor would it provide the generous and effective housing land supply required by SPP. Some greenfield land will be required to maintain an effective supply.
3. In 2012 the council undertook a strategic review of the green belt in preparation for the proposed plan. This recognised that a limited release of green belt land was not essential in terms of the quantity of development land needed for the lifetime of the proposed plan, but desirable to provide increased range, choice and generosity of sites. That would provide the flexibility indicated by SPP. The review took into account the optimistic growth predictions and selected locations for release from the green belt. All are at a scale that can be supported by existing infrastructure and would therefore be likely to contribute to housing supply in the early years of the proposed plan.
4. The suggested additional site at Barbush Farm North is on a south facing slope separated from Johnstone to the south by the A737 dual carriageway. South of the dual carriageway there is a site at Barbush Farm which is allocated as an additional housing site under Policy P3 of the proposed plan. To the north is a recent school development, to the east a hospital site which is also designated as an additional housing site, and to the west are more agricultural fields. Beyond those, and to the north-west, is the Merchiston Hospital site on the edge of Brookfield, which is also a Policy P3 allocation. There is an existing track north-south through the Barbush site, which connects the road by the new school to Johnstone, via a bridge over the dual carriageway.
5. The appeal site is within the green belt and is part of a wedge of land between the western side of Linwood and the north side of Johnstone. This stretch of land provides a useful function in maintaining a landscape setting and identity for Linwood and Johnstone and discouraging their coalescence with Brookfield. The site itself would end part way across a field system, where the green belt boundary would lack a strong visual or landscape edge, despite recent shelter belt planting.
6. I also agree with the council that, notwithstanding the physical proximity, the site is isolated from existing residential areas and from the services and facilities of Johnstone and Linwood and it is unlikely that the site would relate well to either settlement. This site should not be added to Schedule 2 as an additional housing site under Policy P3.

Reporter's recommendations:
No modification

Issue 35	Lochwinnoch – Alternative Suggested Housing Site	
Development plan reference:	None	Reporter: Philip Hutchinson
Body or person(s) submitting a representation raising the issue (including reference number):		
Church of Scotland Trustees (1810)		
Provision of the development plan to which the issue relates:	Alternative suggested housing site on green belt land at Lochwinnoch	
Planning authority's summary of the representation(s):		
<p><u>Church of Scotland Trustees (1810)</u></p> <p>Promotion of land at Lochwinnoch Glebe (Site Ref.5023), which currently falls outwith the settlement boundary of the village and within the countryside and green belt, but has the ability to be developed for a sustainable residential development without detrimental impact on the wider landscape character or biodiversity within the settlement. The site is currently fenced off for grazing sheep; has minimal recreational value and development would not cause the loss of natural environment currently accessed and used by the public.</p> <p>The site as now proposed is reduced in scale, in order to address a number of concerns raised by the council. The site is no longer proposed for 40 units, rather it is suggested to develop the site as a series of generous plots for larger houses that would be of local vernacular in style and materials used. The countryside to the north east of the site would remain open and retain the sense of the natural environment at the edge of the settlement. The revision to the proposed site boundary means the site is now some distance from the Beech Burn and, thereby, has a reduced flood risk. Remaining drainage issues will need to be addressed, but are considered to have neutral impact.</p> <p>The existing access point to the proposed site can be taken from Parkhill Drive/Eastend. A "minor access link" road can be achieved at this point so as to ensure the appropriate roads standards are met. Ownership of the strip of land between the site and Beechburn Crescent is not known, therefore access by this route is not an option at this time.</p> <p>The proposed site is effective and capable of being delivered within 5 years. The plan does not currently identify any housing sites in Lochwinnoch. In order to meet local requirements and share the benefits of new housing across the range of settlements, local rationalisation of the green belt is required.</p>		

Modifications sought by those submitting representations:
Inclusion of Lochwinnoch Glebe as a housing site and its removal from the green belt. (1810)
Summary of responses (including reasons) by planning authority:
<p><u>Lochwinnoch Glebe (1810)</u></p> <p>The proposal for the original submission for the site has significantly decreased in size and concentrates development on land which is considered to be within the village envelope. It is agreed that this reduction goes some way to addressing concerns raised by the council about flooding, landscape impact and biodiversity value. However, it is still considered that the site is undesirable for development given the limited relationship with the surrounding built form and the visual impact that the development would have on the Category B listed Manse building.</p> <p>Gaining access to the site presents a challenge. It would not be possible to achieve a frontage onto or an access via Beechburn Crescent and the existing access would require to be upgraded in order to be an adoptable standard. Without an access on or a visual relationship with Beechburn Crescent, it is difficult to see how the site can fully integrate with the surrounding area and therefore would be unable to make a positive contribution to the character and appearance of the settlement. While Policy ENV1 – green belt does not preclude appropriate development which makes a positive contribution to the place, this site has poor relationship with the surrounding area and is not suitable for development. Therefore, an allocation for housing is not appropriate and green belt status should be retained.</p> <p>No housing sites have been identified in Lochwinnoch because none of those which were put forward on the edge of the settlement, relate well and contribute to a sense of place and the landscape setting of the village.</p>
Reporter's conclusions:
<ol style="list-style-type: none"> 1. In a sense the site is reasonably well contained with rows of detached houses on 3 sides - in one case on the far side of Beechburn Crescent. Its north eastern boundary (as adjusted) is defined by the former manse, its mature gardens and a length of hedge separating this now reduced site from the balance of the Glebe. 2. However the site is bisected diagonally by the private drive to the former manse, and no access solution has been demonstrated in any detail. A wide verge with ornamental trees separates the site from the carriageway in Beechburn Crescent. The ownership of this verge has not been established. 3. An alternative access route might be via the outer end of Eastend but no details are available. This would involve changes to the existing drive to the former manse, the provision of footpaths and street lighting. Some compromise in roads standards cannot be ruled out. I accept that appropriate technical studies will be carried out to establish the effectiveness of the site. Any reassurance from such studies is still awaited. There is presently no sign of developer interest. I am not therefore confident that the site could become effective within the life of the plan. Even so, the numerical contribution would be very small.

4. The site might lend itself to a handful of heavily landscaped plots sharing a private drive. However the former manse has been subdivided and additional reliance on a private drive may fall foul of the authority's road access standards. A proposal of this order does not necessarily call for an alteration to the green belt boundary. Some compromise might still be struck in relation to a planning application.

5. There would remain the challenge of reconciling any development with the setting of the B-listed former manse. This building commands its approach across the featureless objection site.

6. Despite the housing land supply situation (from issue 17) I am still not satisfied that all my reservations about this site can be set aside at this time.

Reporter's recommendations:

No modification.

Issue 36	Paisley – Alternative Suggested Site Allocation	
Development plan reference:	None	Reporter: Dannie Onn
Body or person(s) submitting a representation raising the issue (including reference number):		
Scottish Water (154) Stewart Milne Homes (1883) Callum Murray (1956) J & H Ritchie Ltd (2090)		
Provision of the development plan to which the issue relates:	Alternative suggested land use around Paisley including Arkleston Farm, Honeybog Hill, Stanely Road, Gleniffer Road and Paisley South.	
Planning authority's summary of the representation(s):		
<u>Scottish Water (154)</u> Proposal for positive identification of land at Stanely Road (Site Ref.5055) for housing. The site is brownfield, within the urban area, bounded on three sides by existing housing and is surplus to requirements. Development would bring about a visual enhancement of the area. Positive allocation would provide certainty, contribute to a generous supply of appropriate and effective housing land and would reduce the need to release greenfield or greenbelt sites elsewhere. The brownfield site at Gleniffer Road (Site Ref.5056) should be removed from the green belt. The site is in need of regeneration and in its current condition does not contribute positively to the green belt or to Paisley. The site is in a sustainable location and will become surplus to requirements in the plan period. Removing the site from the green belt would be an effective land release which would considerably enhance the amenity of the area. <u>Stewart Milne Homes (1883)</u> The greenfield land at Honeybog Hill (Site Ref.5013) should be allocated for housing with an indicative capacity of 175 units. There are no significant constraints to development of the site for housing. Development of this site would be sustainable, maximising use of existing infrastructure and services. It would be highly accessible by a range of transport modes. The site is effective and capable of development in the short to medium term. The site is visually well contained, would not impact on the adjoining green belt and would not set precedents for development in the Arkleston area to the north. <u>Callum Murray (1956)</u> The owner of land included within the Paisley South Expansion Area, welcomes the inclusion of this land in the LDP and considers that adjacent land should also be		

designated as housing land within the Paisley South Expansion Area. The respondent is also keen to be involved in the future planning of this area. This issue is concerned with the proposal to designate this land as housing land. The specific issues relating to Paisley South Expansion Area are addressed under Issue 39.

J & H Ritchie Ltd (2090)

This issue addresses the residential and the overall mixed use proposal, while the office and light industrial proposal are addressed under Issue 5 - Renfrewshire's Economic Investment Locations. Objection to proposals for development of land at Arkleston Farm not being included within the proposed Plan. The area should be removed from the green belt, included within the settlement boundary for a mixed use development which includes residential, light industrial, office and open space. The site is considered to have a robust and mature landscape framework which provides containment. The mixture of uses would enable the development to be sustainable, would provide regeneration, deliver community benefits, improve Paisley's housing stock and present an opportunity to realign Arkleston Road and improve the access to the M8. The location of the site is sustainable, it has good linkages to the built up area and is accessible to services and amenities. The development proposal would respect the landscape and provide an attractive gateway feature. The respondent agrees with the terms of Proposal P3 that should development not occur within the lifetime of the plan, it should revert back to green belt.

Modifications sought by those submitting representations:

Amend Schedule 3 to provide:- RFRF5055 - Land at Stanley Road, Reservoir, Gleniffer Road, Paisley – 20 units. (154)

Amend the Proposal map to exclude the site at Gleniffer Road (Site Ref.5056) from the green belt. (154)

The land at Honeybog Hill, Paisley should be added to Schedule 2 as an appropriate additional greenfield housing site with an indicative capacity of 175 units. (1883)

The remaining land within the respondent's ownership should be designated as housing land and be included within the Paisley South Expansion Area. (1956)

The land at Arkleston, should be included in the Local Development Plan even with a "develop or lose it status" being a requirement for inclusion in the Local Development Plan. (2090)

Summary of responses (including reasons) by planning authority:

Land at Stanely Road (154)

Agree that residential development on this site would be a positive visual enhancement. The site is covered by Policy P1 - Renfrewshire's Places, where there is presumption in favour of the continuance of the existing built form. This site is suitable for a range of uses provided they would be compatible and complimentary to the existing residential development which bound the site on two sides. It is agreed that this site may be suitable

for housing, however, Schedule 3 outlines Renfrewshire's Total Housing Land Supply setting out the effective and established housing land supply as identified in the Housing Land Audit 2012 (CD/38). The specific suitability of residential use on this site would need to be tested through the submission of a planning application. The Policy P1 zoning is appropriate for this site.

Gleniffer Road (154)

Site is in a prominent location and part of the escarpment that forms a boundary to the settlement of Paisley. Development of this site would begin the extension of Paisley up onto the escarpment that currently serves as a strong green belt boundary. The form and the location of this site presents challenges if it were to be developed and it would be difficult to ensure that the site was fully integrated with the surrounding area. It is considered that it would be unlikely that the site would become effective within the lifetime of the proposed Local Development Plan (LDP) because it would require significant work to prepare the land for development and the site is currently still in operational use by Scottish Water. Re-zoning this land would have an impact on the integrity of the green belt land surrounding the site; for that reason the land use zoning should remain as green belt.

Honeybog Hill (1883)

This site is on an important and sensitive wedge of green belt between Paisley and Glasgow which is already limited in extent. Any further incursions into the green belt in this area would be seen as setting a precedent which could result in further coalescence between Paisley and Glasgow or Hillington Industrial Estate to the North. It is accepted that the site is unconstrained and accessible but it is considered that development of this site would have a detrimental impact on the local landscape character due to the loss of an open green setting. The site is part of a visible green backdrop to this urban edge of Paisley which contributes to protecting the landscape setting. It presents a clear and defensible boundary which prevents development from spreading along the fields. The site lies on a prominent position and although a comprehensive, well structured planting screening has been suggested as part of the proposal it is considered that development of this site would change the landscape character and visual profile of the area which would be undesirable. The council has assessed the relative merits of the various development options which were available across Renfrewshire but because of the issues raised above, it is considered that the land use zoning should remain as green belt.

Paisley South (1956)

The council notes and welcomes support for the allocation of the Paisley South Expansion Area in the proposed LDP. The council along with the NHS, owners of Dykebar Hospital and the UWS, owners of Thornly Park campus, will aim to involve and update everyone surrounding the site or those with an interest in the site. The land put forward and suggested by the respondent is unlikely to be required for development of the site. The boundary to the south of the site is strong and defensible and including the respondent's land beyond this boundary would set an undesirable precedent as detailed in Issue 39. The land use zoning of this suggested land should remain in green belt.

Arkleston Farm (2090)

This site is on an important and sensitive wedge of green belt between Paisley and Glasgow which is already limited in extent. Any further incursions into the green belt in this area result in coalescence between Paisley and Renfrew or Hillington Industrial Estate and further south with Glasgow. The site is prominent from the motorway and the railway line as well as the local road surrounding the site. It provides an attractive green and open landscape buffer which contrasts to the industrial area of Hillington and the residential area of Gallowhill, which it both visually and physically separates. The fields themselves provide a positive contribution to the landscape character of the area and are an attractive gateway feature; development would have a significant impact on the area.

While it is agreed that the site is well contained, this containment is provided by clear and defensible green belt boundaries which would be compromised by permitting development to extend into the open undulating arable fields. Development would be unlikely to have a positive relationship with Gallowhill. Although the site may well be accessible, it is contested that the development of this green belt site would be sustainable or provide regeneration benefits, because it would be in direct conflict with the proposed LDP strategy, which focuses on the development of previously used sites, concentrating on existing built up areas and key redevelopment sites. Nor would any supposed community benefits that may be provided outweigh the important role that this site plays within the green belt. The council has assessed the relative merits of the various development options which were available across Renfrewshire, but because of the issues raised above, it is considered that the land use zoning should remain as green belt.

Reporter's conclusions:

General

1. As stated in the conclusions in the report on Issue 17, the proposed plan does not identify sufficient land on a range of sites which are effective or capable of becoming effective to meet the housing land requirement up to year 10 from adoption, ensuring a minimum of 5 years effective land supply at all times. The council will be expected to produce further guidance to resolve this. I have therefore assessed the sites under this issue on their individual merits.

2. In 2012 the council undertook a strategic review of the green belt in preparation for the proposed plan. This recognised that a limited release of green belt land was not essential in terms of the quantity of development land needed for the lifetime of the proposed plan, but desirable to provide increased range, choice and generosity of sites. That would provide the flexibility indicated by SPP. The review took into account the optimistic growth predictions and selected a few locations for release from the green belt. All are at a scale that can be supported by existing infrastructure and would therefore be likely to contribute to housing supply in the early years of the proposed plan.

Stanley Road

3. This site is towards the edge of southern Paisley in an established residential area. I agree that this site would be suitable for housing. It could add to the range and choice of sites in the urban area, supporting the supply of land for housing. However, it is shown on the proposal map as being in an area of existing development where policy P1 applies. That would allow housing, subject to detailed considerations, as well as other potential developments. There is no need to change to an allocation specifically for

housing.

Gleniffer Road

4. The site on Gleniffer Road is within the green belt and on a hillside above the nearby housing on the outskirts of Paisley. Close to Gleniffer Braes, it forms part of the landscape setting of Paisley. This hillside forms a strong boundary to the green belt and a clear edge to the town. Its allocation for housing would weaken the green belt at this point and appear as encroachment into it.

5. I note that the site is currently in use as part of the water infrastructure for the town, but is expected to become surplus to requirements, but there are also constraints on the site, indicating that it may not be effective in the lifetime of the plan. The site can be classed as previously developed land and may be considered for some form of development in future under green belt policy. However, the impact of the existing works is low. The site appears as a part of the countryside surrounding Paisley rather than part of it. There is no justification for removing this site from the green belt.

Honeybog Hill

6. Honeybog Hill lies to the north-east of Paisley, close to the border with Glasgow City at Penilee Road. It is in the designated green belt and part of a relatively small but important separation between Paisley to the west and Glasgow to the east, and between industrial development and the M8 corridor to the north and development either side of Glasgow Road to the south. The proposed site is visually contained by the hill slope to the north and the existing housing to the south, although it would intrude between the golf course to the east and the agricultural land to the north, both of which are also part of the green belt.

7. Development of this site for housing would be a major intrusion into one of the remaining pockets of green belt separating Paisley and Glasgow. I note the contained land form and there is a thoughtful design logic to the proposal. I also accept that the site is unconstrained and accessible. However, the landscape setting and identity of both Paisley and Glasgow would be weakened by development here. In my view, this area of open green belt is too important to lose. This site should not be removed from the green belt at this time.

Land adjacent to Paisley South Expansion Area

8. The Paisley South Expansion Area subject of Policy P6 in the proposed plan has been considered under issue 39 below. That site is a general location identified as a possible long term expansion to Paisley. It is considered now for investigation purposes only. The extent of land that would be required can be assessed as part of that study proposed in the policy. There is no need to allocate further land here at this time.

Arkleston

9. Arkleston Farm occupies almost all of the green belt between Paisley and Glasgow that lies between the M8 motorway and the railway line connecting Glasgow to Paisley (and other places). Together with the area to the south of the railway line, which includes the suggested site at Honeybog Hill (see above), this forms part of a relatively small but important separation between Paisley to the west and Glasgow to the east, and between

<p>industrial development and the M8 corridor to the north and development either side of Glasgow Road to the south. This part of the green belt is defined by clear and defensible boundaries.</p> <p>10. The farm is proposed for residential, industrial and business use. The industrial and business uses are considered under issue 5 of this report. The conclusion is that the green belt here prevents the coalescence of Paisley and Glasgow and that there is no justification for releasing the green belt land for industrial and business uses, including a motorway service area.</p> <p>11. Housing is proposed for the western part of the farm site. That too would encroach upon the small but highly significant green belt pocket between the settlements. Although some green belt would remain, it would be reduced in size and the remaining boundary would be less robust. The purposes of the green belt would be harmed in my opinion. The site should not be allocated for housing and the green belt should remain.</p>
<p>Reporter's recommendations:</p>
<p>No modifications</p>

Issue 37	Policy P4 – Housing Action Programme Sites	
Development plan reference:	Policy P4 – Housing Action Programme Sites	Reporter: Dannie Onn
Body or person(s) submitting a representation raising the issue (including reference number):		
Persimmon Homes (West) Scotland (186) David Wilson Homes West Scotland (2095) The Consortium - CALA Homes West, Persimmon Homes and Lynch Homes (2112) CALA Homes West (2114)		
Provision of the development plan to which the issue relates:	Sites identified as capable of becoming effective housing sites to ensure that there is a continuous 5-year effective housing land supply	
Planning authority's summary of the representation(s):		
<u>David Wilson Homes West Scotland (2095)</u> Raise concerns in relation to Renfrewshire Council's proposed means of meeting the shortfall of housing land with the use of proposed Local Development Plan (LDP) Action Programme Housing sites alongside additional housing sites. However, it is evident that the following sites have been double counted, having been included in both the established land supply and the proposed LDP Action Programme list : RFRF0759, Kilbarchan Road, Bridge of Weir RFRF 0875, Bute Crescent / Iona Avenue, Glenburn, Paisley RFRF 0839 Almond Crescent, Foxbar, Paisley RFRF 0671 Findhorn Avenue / Dee Drive, Foxbar, Paisley RFRF 0773 Almond Crescent, Foxbar, Paisley RFRF 0926 Springbank Terrace, Shortroods, Paisley RFRF 0927 Shortroods Crescent / Inchinnan Road, Paisley This effectively reduces the housing land supply by 463 homes. As such, the output from the proposed LDP Action Programme sites over and above that anticipated from the effective supply should be reduced by 463. <u>Persimmon Homes (West) Scotland (186), The Consortium - CALA Homes West, Persimmon Homes and Lynch Homes (2112), CALA Homes West (2114)</u> The council has identified 25 LDP Action Programme Housing Sites (Policy P4) totalling 1,414 homes to assist meet the emerging housing land shortfall of 1,833 homes to 2025. The indicative capacity of these LDP Action Programme Housing Sites is 1,454 homes and not 1,414 homes as stated in the proposed LDP. However, 651 homes on 10 sites are already considered as part of the Established Housing Land Supply. Therefore, the council's development strategy only allocates 803 homes on 15 Housing Action Programme Sites.		

It is evident that the council has not demonstrated how development constraints making sites non-effective can become effective over the plan period. The LDP Action Programme sites have constraints that need to be dealt with in order to confirm effectiveness as set out in PAN 2/2010 (CD/42) and their intended delivery has not been programmed over the proposed LDP period to 2025. Only one site of 70 homes (Arkleston Road, Paisley Ref: UC/12/02) could be confirmed as effective.

As well as still needing to clarify whether all LDP Action Programme Housing Sites are effective, the likely annual rate of completions from each site still needs to be assessed, taking into account lead in times to the commencement of construction. There is no evidence presented by the council that this exercise has been carried out.

Given the above appraisal, the risk of failure of the proposed development strategy underperforming is unacceptably high.

It is not necessary for the proposed LDP to present the LDP Action Programme Housing Sites as part of the housing land supply. These can be seen as 'opportunities' for housing development and should not be included until their effectiveness is determined. However, these sites could make up part of the generous land supply. We recommend that the policy be revised to reflect this status.

Modifications sought by those submitting representations:

The output from the LDP Action Programme sites over and above that anticipated from the effective supply should be reduced by 463. (2095)

Amend Policy P4 – Housing Action Programme Sites as follows (*italised*):

POLICY P4 - Housing Action Programme Sites

The council will aim to support and enable housing sites which are capable of becoming effective by identifying the necessary requirements needed to help implement and deliver housing on these sites. The sites are set out in Schedule 4 and the actions for implementation and / or delivery are detailed in the LDP Action Programme. *These sites are 'opportunities' and will not be considered part of the housing land supply until their deliverability and effectiveness is proven. These sites will assist the council to provide a generous land supply to 2025.* (186, 2112, 2114)

Summary of responses (including reasons) by planning authority:

David Wilson Homes West Scotland (2095)

In meeting the shortfall, both green belt and brownfield sites have been identified. The green belt release could provide 1000 and 1500 units. In accordance with the approach outlined in Scottish Planning Policy (CD/03) and the Strategic Development Plan (SDP) (CD/02), the proposed LDP has put forward brownfield land in areas of need of regeneration which would improve places that are also within sustainable locations. Such action not only contributes to the delivery of the housing land supply but would deliver

many other benefits including physical, social and environmental enhancements. It would seem reasonable, therefore, for brownfield land to be included to meet the shortfall in the housing land requirements for the proposed LDP.

Persimmon Homes (West) Scotland (186), David Wilson Homes West Scotland (2095), The Consortium - CALA Homes West, Persimmon Homes and Lynch Homes (2112), CALA Homes West (2114)

In relation to double counting, it would appear from Schedule 4 in the LDP, that there are 10 sites that count toward the established land supply in Schedule 3 of the LDP and also count towards meeting the housing land requirements in the LDP Housing Action Programme sites. The list prepared which detailed the LDP Housing Action Programme sites that was published was not the correct version as approved by the Planning and Economic Development Policy Board on the 20 November 2012. The Housing Action Programme list approved by the Board detailed the 1414 units, whereas the published version of the proposed LDP detailed 1454 units. There is also a slight variation in the sites that are on both lists. The Board version of the proposed LDP does not contain any double counting. The established sites that are also highlighted in the Schedule 4 Action Programme list are not counted twice, therefore the correct version of the table requires to be inserted in the final LDP. If the Reporter is so minded the Schedule 4 list that is in the current published proposed LDP be replaced with the version that was approved at Board (CD/53).

Persimmon Homes (West) Scotland (186), The Consortium - CALA Homes West, Persimmon Homes and Lynch Homes (2112), CALA Homes West (2114)

The council recognise that they set out the potential constraints to each LDP Housing Action Programme site and do not demonstrate how these development constraints can be satisfactorily dealt with allowing each site to be capable of becoming effective. The council has produced an addendum to the Housing Land Requirements Background Paper (CD/40) detailing, amongst other things, various methods of how the council will work to bring these sites forward and have put each through the effectiveness test as set out in PAN 2/2010 (CD/42).

We would disagree with the statement that (Arkleston Road, Paisley) is the only site in the list of 1414 units that is effective. It is considered that a number of the sites are free from many of the constraints, have planning consent and a developer has been identified to take the sites forward, therefore would otherwise be considered as effective however given the current financial situation these sites are not attractive to developers. It is considered that this becomes more an issue as green belt land is becoming available in the LDP.

The work on the LDP Housing Action Programme sites is a particular action within the LDP Action Programme (CD/01) to allow the council to look at best practice, various mechanisms and other options to help bring these sites forward. However since the publication of the proposed LDP there has been some early work undertaken looking at how these sites could be made effective, timescales, programming and funding mechanisms. All of this detail is outlined in the addendum to the Housing Land Requirements Background Paper (CD/40).

The council is committed to enabling and supporting many of the housing development sites that have not been successfully delivered over the years. These sites are an

important part of regenerating areas and creating strong communities which is not only a focus in national and strategic plans but is a priority which is central to the aims and outcomes of many of Renfrewshire Council's policy and strategy documents. Although many of the sites within the Housing Action Programme list may be seen as posing a high risk of failure to delivering the housing land requirements, it can be confirmed that there has never been such strong commitment and positive proactive approach by the council to enabling development in these sites.

It is important for the council that the sites within the Housing Action Programme list are seen as being land included to meet the housing land requirements for the area. Furthermore due to the council's commitment to trying different delivery mechanisms and partnership approaches as outlined in Issue 17 and the addendum to the Housing Land Requirements Background Paper (CD/40), it is considered that these sites are capable of becoming effective so should be part of the housing land supply identified in this proposed LDP. We do not agree that the policy should be altered.

Reporter's conclusions:

Housing Action Programme Sites

1. The focus of the spatial strategy for the proposed plan is on previously used sites, concentrating on existing built up areas and key redevelopment sites, aiming to facilitate sustainable development and a low carbon economy. That would contribute to sustainable economic growth and high quality sustainable places, which are at the heart of SPP. It would also help to protect the valuable assets and resources of rural Renfrewshire. Where the plan proposes to release sites for development outwith urban areas, they are of a scale where they can be supported by existing infrastructure, services and facilities.
2. To minimise the impact on the green belt and reduce the need for additional infrastructure development, the council has identified sites in the urban areas which could be used to build homes. Some of these sites are not effective; that is, they cannot be developed for housing within the 5-year period. The council seeks to overcome the constraints on these sites which have prevented them from being assessed as effective for housing development.
3. The commitment shown by the council and the measures they are prepared to take indicate that many of these sites could become effective. Under issue 17, I have said that it is appropriate to take an optimistic outlook for the economy to meet housing targets based on an optimistic growth scenario. Many of the Housing Action Programme sites would be effective were it not for the recent economic downturn. There are now clear signs of an improving economy. With that in mind, coupled with the council's commitment to overcoming other constraints, I consider that all of these sites can be considered now as capable of becoming effective within 5 years and thereby contributing to the required housing land supply. They should remain in the identified housing land supply and policy P4 needs no modification.
4. I have also found under issue 17 that the proposed plan does not identify sufficient land on a range of sites which is effective or capable of becoming effective to meet the housing land requirement up to year 10 from adoption, ensuring a minimum of 5 years effective land supply at all times. This deficiency clearly supports the view that there is a risk of failure in the strategy for the proposed plan. However, our recommendation is that

adoption of the proposed plan should not be held up while this is resolved, but that there should be supplementary guidance prepared to address the shortfall. On that basis, there would be a re-evaluation of the Housing Action Programme sites and the progress that has been made. Clearly, should any of these sites prove incapable of becoming effective in the following 5 years, the council would need to find additional effective housing land elsewhere.

5. I note that the proposed plan includes the wrong information at Schedule 4 on pages 38 and 39, which appears to show double counting. The council has explained that the correct version was approved by the Planning and Economic Development Policy Board on the 20 November 2012 and is found at core document CD53. That version should replace the schedule in the proposed plan.

Reporter's recommendations:

1. Replace Schedule 4 in the proposed plan with the version of the table set out in core document CD53.

Issue 38	Policy P5 - Community Growth Areas	
Development plan reference:	Policy P5 - Community Growth Areas	Reporter: Dannie Onn
Body or person(s) submitting a representation raising the issue (including reference number):		
George Cullen (517)		
Provision of the development plan to which the issue relates:	Support development in community growth areas	
Planning authority's summary of the representation(s):		
<p><u>George Cullen (517)</u></p> <p>Whilst Policy P5 states a clear preference for community growth area sites to be master planned, we understand from speaking to Renfrewshire Council's Planning Officers that they will be looking to determine planning applications coming before the adoption of the local development plan. On this basis, and given the planning application submitted by Dawn we request that the council ensures that no proposals in any way prejudice the access of other sites.</p>		
Modifications sought by those submitting representations:		
None suggested. (517)		
Summary of responses (including reasons) by planning authority:		
<p><u>George Cullen (517)</u></p> <p>When considering a planning application in any area, including in the proximity of Community Growth Area sites, amongst a range of issues considered, the council routinely ensures that development proposals do not prejudice the access of other or potential development sites. Therefore, the development or future potential development of other sites within community growth areas will not be compromised, nor will the development of sites that surround community growth areas.</p>		
Reporter's conclusions:		
<p>1. This representation in respect of Policy P5 looks to the council to protect access in relation to a possible planning application in the Johnstone South West Community Growth Area should it be made before the adoption of the proposed plan. That cannot be a matter for this examination, which looks at the representations to the proposed plan itself. It would be a matter for planning applications.</p> <p>2. Policy P5 – Community Growth Areas simply supports and encourages development</p>		

within the community growth areas where that would support the principles set out in the approved masterplan for the sites. I have no doubt that the approved masterplan will be a significant material consideration in the determination of any planning application that does come forward and that the council is correct when it says that it routinely ensures that development proposals do not prejudice the access of other or potential sites.

Reporter's recommendations:

No modification

Issue 39	Paisley South Expansion Area	
Development plan reference:	Policy P6 – Paisley South Expansion Area	Reporter: Dannie Onn
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Standard Letter: See Appendix 1 attached.</p> <p>Other Representations</p> <p>University of the West of Scotland (89)</p> <p>RSPB Scotland (184)</p> <p>Persimmon Homes (186)</p> <p>Gillian McCarney (216)</p> <p>John & Mary Jo Morrow (232)</p> <p>Caroline Shiels (235)</p> <p>Edward Boden (252)</p> <p>Caroline Gillespie (257)</p> <p>Elizabeth Barr (284)</p> <p>Jacqueline O'Neill (287)</p> <p>Robert Muirhead (289)</p> <p>Gordon Fulton (290)</p> <p>Lesley Payne (291)</p> <p>Lesley-Anne McHarg (309)</p> <p>Flora McPhail (312)</p> <p>Tracey Moffat (326)</p> <p>Christopher Moffat: (327)</p> <p>Audrey Robson (329)</p> <p>Graeme Scott (330)</p> <p>Laura Crimmon (337)</p> <p>Karen Gordon (341)</p> <p>Elizabeth Kelly (342)</p> <p>David Lowe (343)</p> <p>Graeme Stewart (353)</p> <p>Lynda Macrae (377)</p> <p>Francis Murray (382)</p> <p>Paul Shaw (388)</p> <p>Mary Morrison (389)</p> <p>Florence Dimarco (390)</p> <p>Matthew Lang (391)</p> <p>William Webster (392)</p> <p>Alex Steele (416)</p> <p>Carolyn O'Hare (421)</p> <p>Ian Wallace (426)</p> <p>William McGill (428)</p> <p>Christine Eddy (429)</p> <p>James Maughan (434)</p>	<p>Mrs J L Scaglione (1835)</p> <p>Mr R J Scaglione (1837)</p> <p>Sarah Bell (1838)</p> <p>Eric McWaters (1839)</p> <p>Peter and Moira Monaghan (1845)</p> <p>Jemima Fairlie (1847)</p> <p>Eileen Mulgrew (1849)</p> <p>Helen Perry (1850)</p> <p>E D Pringle and E A Pringle (1852)</p> <p>Ronald and Margaret McGuire (1855)</p> <p>William, Ann and Alan Armstrong (1858)</p> <p>Sandra and John Denton (1861)</p> <p>Sarah McKeown (1862)</p> <p>Nan Dunn (1868)</p> <p>Grant and Jennifer Ballantyne (1869)</p> <p>Denise and Alan Hooper (1872)</p> <p>Stewart and Rebecca McIntyre (1874)</p> <p>Anne Nightingale and Kevin Stapleton (1875)</p> <p>Mr and Mrs Scales (1877)</p> <p>A R Thomson (1879)</p> <p>Gordon Matthew (1881)</p> <p>Stewart Milne Homes (1883)</p> <p>Mark Dinardo (1884)</p> <p>May Begg (1887)</p> <p>Councillor Marie McGurk (1888)</p> <p>Alistair Muir (1889)</p> <p>Anna Muir (1890)</p> <p>Duncan McIntosh (1891)</p> <p>James Pope (1892)</p> <p>Bob and Elizabeth Meikle (1893)</p> <p>Gerald Dolan (1894)</p> <p>Mary E Park (1895)</p> <p>James and Jessie MacKenzie (1896)</p> <p>Alison and Scott Wright (1897)</p> <p>Elizabeth Davidson (1899)</p> <p>L Sutherland (1901)</p> <p>Linda Barrett (1904)</p> <p>S Hucker (1909)</p> <p>A Barrett (1910)</p> <p>Stuart McAllister (1911)</p> <p>Sheila Maclachlan (1913)</p> <p>Kirsty Watters (1917)</p>	

<p>Alexander Wright (435) Colin MacKenzie (436) Jan Forrest (438) Alan Gillies (439) Tracey Thomson (442) Lynne Harrison (445) Iain Skene (446) Candida Milard (448) Marian McGlinchey (449) Jane Dickson (450) Gillian Collins (462) Fiona McLaughlin (473) Alexander Davison (477) Gillian Callaghan (479) Jacqueline Armour (480) Michael McKeary (483) Lyndsey McGill (486) I Barr (487) David Davidson (490) Anne Monaghan (500) Thomas Wilson (508) Thomas Dempster (510) Christopher Sherlock-Scougall (511) Veronica Mitchell (512) V Lyall (515) Chris Johnstone (516) Dorothy Kerr (524) Alex Morrison (536) F E Ballantyne (572) Fiona Nuttall (1280) P E McNally (1775) Hawkhead and Lochfield Community Council (1811) Anne Gillespie (1813) Alan Reid (1814) Pauline Fergusson (1815) Peter Dixon (1816) Ann and John Cameron (1823) Anne Johnstone (1824) Sandra Barr (1825) Joseph Barr (1831) Robert Todd (1833) David and Helen Robertson (1834)</p>	<p>Julie Reid (1919) Lorne Alexander (1922) Neil McGovern (1925) Thomas Marr (1926) John Lewis (1927) Neil Grant (1928) Alexander and Anne Eadie (1929) Graham Dixon (1930) C and F Oswald (1932) Michael and Katherine Taylor (1933) Elizabeth and John McKinnie (1934) Mr and Mrs Henderson (1935) Joe and Sylvia Egan (1936) Sarah Louise McCaffer (1938) East Renfrewshire Council (1940) Mary Ryan (1942) Mary Docherty and Jim McBeath (1943) Drs A and J Dowie (1944) Jamie Herron (1945) Iain and Yolande McPee Claes (1946) David Macpherson (1947) Kerry Ramsay (1948) David Rodger (1949) Janet Mitchell (1950) Donald and Jean Isaacs (1951) June Ramsay (1954) Kate McVey (1955) Callum Murray (1956) Robert Harvie (1957) Henry N McLaren (1958) Margaret Sherlock (1959) Callum McGaw (1960) Margaret Johnston (1961) Lindsay & Paul O'Neill (1962) Kirsten Ferguson (1963) Ian Taylor (1964) Mr J A Gracie (1965) Homes for Scotland (2085) Councillor Paul Mack (2105) Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112) Cala Homes West (2114)</p>
<p>Provision of the development plan to which the issue relates:</p>	<p>The proposition that land to the south of Thornly Park and Dykebar is identified for a possible long term expansion of Paisley.</p> <p>-</p>

Planning authority's summary of the representation(s):

Support

University of the West of Scotland (UWS) (89)

Confirms the view that the former Paisley Lawn Tennis and Squash Club at South Avenue is suitable, available and viable and forms part of a wider area where the university is willing to participate in a master plan preparation. Also consider that the site meets the criteria for inclusion within Schedule 1 as it is a previously developed site where its previous use ceased approximately ten years ago. The University confirms its willingness to work with the council to prepare a suitable scheme for the site.

Support the proposed designation of Paisley South as an area to be investigated for its long term development potential under Policy P6 – Paisley South Expansion Area. UWS confirm that the site is available and viable.

Persimmon Homes (186)

Support the inclusion of Policy P6 as identified within the proposed Local Development Plan (LDP). Confirm they control part of the land holdings included within the study area and would be prepared to work with the adjoining owners along with Renfrewshire Council to formulate the future long term expansion of Paisley.

Callum Murray (1956)

Welcome the inclusion of the site within the proposed LDP. It is considered that the remaining land within their ownership should be designated as housing land and within the Paisley South Expansion Area.

Green belt and Landscape Character

Standard letter: 520, 521, 522, 523, 524, 525, 526, 527, 528, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 1775, 1790, 1791, 1792, 1793, 1794.

Other Representations: 232, 235, 252, 287, 289, 290, 291, 309, 326, 330, 341, 342, 343, 353, 377, 382, 388, 389, 390, 416, 421, 426, 428, 429, 434, 435, 436, 438, 439, 442, 445, 448, 449, 450, 473, 477, 479, 480, 483, 487, 490, 500, 508, 510, 511, 512, 515, 1280, 1775, 1811, 1813, 1814, 1815, 1823, 1824, 1825, 1831, 1833, 1834, 1835, 1837, 1839, 1845, 1847, 1849, 1852, 1855, 1858, 1861, 1862, 1868, 1869, 1872, 1874, 1875, 1877, 1879, 1881, 1884, 1887, 1888, 1889, 1890, 1891, 1892, 1893, 1894, 1895, 1896, 1897, 1899, 1901, 1904, 1909, 1910, 1911, 1913, 1917, 1919, 1922, 1925, 1926, 1927, 1928, 1929, 1930, 1932, 1933, 1934, 1935, 1936, 1938, 1942, 1943, 1944, 1945, 1946, 1947, 1948, 1949, 1950, 1954, 1955, 1957, 1958, 1959, 196, 1963, 2105

Existing green belt should not be re-classified for housing development as it represents a significant and unnecessary despoliation of this scarce and precious asset. The proposal is contrary to the other council's policies and the New Development Supplementary Guidance (SG) (CD/03) on development in the green belt. It would set a precedent for

further green belt development around Paisley and would not consolidate Paisley's built up area. We should be enhancing green belt sites not destroying or eroding them. Good agricultural land will be lost.

Chris Johnstone (516)

The use of this green site for housing would be a disaster. Have no problems with the site being used for energy production, an incinerator or biomass degrader, but not for housing while other sites are available.

Lindsay & Paul O'Neill (1962)

The area concerned is of large scale, and currently is a valuable area of countryside contributing significantly to the character and setting of the southern approaches of Paisley. Valuable woodland will be destroyed.

Coalescence between Paisley and Barrhead

Standard letter : 520, 521, 522, 523, 524, 525, 526, 527, 528, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 1775, 1790, 1791, 1792, 1793, 1794.

Other Representations: 232, 252, 343, 353, 428, 462, 477, 480, 487, 500, 510, 511, 516, 1775, 1813, 1816, 1823, 1825, 1831, 1833, 1834, 1835, 1837, 1845, 1852, 1869, 1872, 1874, 1875, 1877, 1881, 1884, 1887, 1888, 1891, 1892, 1893, 1894, 1895, 1913, 1922, 1926, 1929, 1930, 1943, 1944, 1949, 1957, 1959, 1962, 1964, 1965

Development of this area of countryside would reduce the green belt between Paisley and Barrhead, will not consolidate development of Paisley's built up area and is outside the town's envelope. It would permanently change the character of the existing southern edge of Paisley.

Councillor Paul Mack (2105)

Object to Policy P6 as any further development will remove the already rapidly diminishing boundary that exists between Barrhead and Paisley.

Greenfield / Brownfield

Standard letter: 520, 521, 522, 523, 524, 525, 526, 527, 528, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 1775, 1790, 1791, 1792, 1793, 1794.

Other Representations: 216, 252, 343, 389, 391, 428, 429, 435, 477, 480, 486, 511, 515, 516, 1775, 1811, 1816, 1823, 1825, 1831, 1833, 1834, 1835, 1837, 1839, 1845, 1852, 1855, 1881, 1884, 1887, 1889, 1890, 1891, , 1892, 1893, 1894, 1895, 1897, 1904, 1909, 1910, 1911, 1922, 1926, 1930, 1933, 1934, 1943, 1947, 1951, 1959, 1965

The proposed LDP aims to release sites to meet the all tenure housing requirement of the Strategic Development Plan (SDP) (CD/02) and the proposed LDP identified a generous supply of housing land for next 10+ years. There is no need to consider the release of the area. There are enough brownfield sites available to meet future housing need. Undermines the policy of redeveloping brown field sites first.

Lindsay & Paul O'Neill (1962)

The proposals are contrary to the fundamentals of current planning policy which prioritises and encourages the re-development of brownfield sites, whilst utilising existing infrastructure and the preservation of valuable green belt. Development should be directed to vacant or brownfield sites and areas of blight, and not detract from the areas that have remained intact, and are of such value. The proposal is not in the interests of the wider and immediate context of Paisley and is fundamentally contrary to Strategic Planning Policy.

Kirsten Ferguson (1963)

Within many areas of Paisley there are houses lying unoccupied for extended periods, and areas of land already earmarked as housing/industrial that are currently lying unused. It seems that there are few justifiable or reasonable grounds for wanting to chip away at Paisley's much needed green belt areas.

Councillor Paul Mack (2105)

The amount of Grade A listed buildings, unoccupied in the town and surrounding area, would surpass any targets that have to be met in terms of housing units till the year 2030, alluded to in the proposed Local Development Plan.

Provision of services and facilities

Standard letter: 520, 521, 522, 523, 524, 525, 526, 527, 528, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 1775, 1790, 1791, 1792, 1793, 1794.

Other Representations: 232, 252, 392, 448, 462, 473, 477, 486, 490, 511, 516, 1775, 1814, 1816, 1823, 1824, 1825, 1831, 1833, 1834, 1835, 1837, 1849, 1850, 1852, 1855, 1858, 1869, 1872, 1874, 1875, 1891, 1897, 1904, 1909, 1910, 1911, 1917, 1919, 1926, 1943, 1944, 1958, 1959, 1965, 2105

The new development would not be close to existing services, facilities and public transport. It would have a huge detrimental effect on the community due to lack of proposed facilities to support such housing. Public transport provision is already stretched and increasing the numbers using these services would decrease the standard of public transport and increase those choosing to use cars or taxis. The schools in the area are already stretched and further housing development would only put further pressure on these schools. The ongoing reduction in school services will not help the necessary new build schools. To support a large village of this kind, schools, community and medical centre, etc, is way beyond the financial resources of any local authority. Proposed housing actually closer aligned to Barrhead facilities.

William, Ann and Alan Armstrong (1858)

Such a community would almost certainly not benefit Paisley economically as residents would be more likely to use their cars to get to shopping centres such as Silverburn.

Drs A and J Dowie (1944)

Lack of employment opportunities in Paisley may not make this an attractive proposition to prospective householders and lack of shopping in town would add to this.

Traffic/roads

Standard letter : 520, 521, 522, 523, 524, 525, 526, 527, 528, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 1775, 1790, 1791, 1792, 1793, 1794.

Other Representations: 252, 337, 389, 391, 392, 435, 438, 439, 446, 462, 473, 477, 480, 486, 500, 511, 1775, 1811, 1813, 1814, 1816, 1823, 1825, 1831, 1833, 1834, 1835, 1837, 1838, 1847, 1849, 1850, 1852, 1855, 1858, 1869, 1872, 1874, 1875, 1877, 1879, 1888, 1889, 1890, 1891, 1895, 1897, 1904, 1909, 1910, 1911, 1917, 1919, 1925, 1926, 1928, 1929, 1933, 1942, 1943, 1944, 1947, 1949, 1958, 1959, 1961, 1964, 1965, 2105

No implications are identified for the development's impact on traffic movement. It would increase traffic congestion and emissions on the local road network and cause safety issues for children crossing. There would need to be a suitable alternative road direct to the site. There is the potential to create a rat run from Grahamston Road to Lochfield Road. Construction and new householder's traffic and services will overburden the current infrastructure. It would necessitate serious widening of Caplethill Road (B774), which is already an accident black spot. The road surface is breaking down and will not sustain further increases in traffic flow. Increased buses utilisation may cause more emissions and is not environment friendly.

Biodiversity, flora and fauna

Standard letter : 520, 521, 522, 523, 524, 525, 526, 527, 528, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 1775, 1790, 1791, 1792, 1793, 1794.

Other Representations: 235, 252, 284, 309, 337, 341, 343, 353, 389, 390, 421, 426, 428, 435, 438, 446, 448, 449, 473, 477, 479, 480, 487, 490, 511, 512, 515, 516, 1280, 1775, 1811, 1813, 1814, 1815, 1816, 1823, 1825, 1831, 1833, 1834, 1835, 1837, 1838, 1839, 1845, 1849, 1850, 1852, 1858, 1862, 1868, 1869, 1872, 1874, 1875, 1877, 1881, 1884, 1887, 1889, 1890, 1891, 1892, 1893, 1894, 1895, 1896, 1897, 1904, 1909, 1910, 1911, 1917, 1919, 1922, 1925, 1926, 1927, 1928, 1929, 1930, 1933, 1935, 1936, 1938, 1942, 1943, 1944, 1945, 1949, 1950, 1955, 1957, 1958, 1959, 1961, 1962, 1963, 2105

Object to Policy P6 there was a failure to give full environmental impact considerations

regarding loss of woodland and wildlife habitats. Also, endangering rare species of flora and fauna. It would mean the loss of woodland, flora and fauna and have an adverse effect on wildlife including wild deer, fox's, badgers, newts, squirrels, foxes and various varieties of birds and bats. Some of these species may be on the European Endangered Species List and covered by other environmental protection legislation. These species need large territories and new housing will deprive them of habitat and food such as grazing and small prey animals. The damage to flora and fauna would be irreversible. Area connects the habitats of the Braes and Thornly/ Dykebar. The disused railway tracks provide wildlife corridors through the surrounding suburbs and are tangible evidence of Paisley's industrial past, an asset for capitalising on the growing national interest in local archaeology. It is a reliable source of good ground and soil for invertebrates which are important for insectivorous mammals and birds.

The trees, which are a particular feature of the area and must assist with the local absorption of carbon monoxide, will be lost. Many of these trees are visually attractive, are of a significant age, and should not be felled and discarded without very careful and deliberate consideration.

Candida Milard (448)

Ask if that if the council is not prepared to protect the trees would it consider community or individual buy out for this purpose.

Neil McGovern (1925), Neil Grant (1928), Mary Ryan (1942)

Surprised that Shaw Wood has no Tree Preservation Order yet the areas surrounding the proposed development does.

Mr J A Gracie (1965)

The Ordnance Survey map sent to residents does not fully emphasise the amount of woodland which would be lost with such a development.

RSPB Scotland (183)

RSPB Scotland did not object to the Paisley South Expansion Area but commented that the Shaw Wood Site of Interest for Nature Conservation should be protected from development.

Flooding

James Maughan (434), Lynne Harrison (445), Christopher Sherlock-Scougall (511), Margaret Sherlock (1959), A R Thomson (1879) and Thomas Marr (1926)

Developing the proposed area would increase surface water runoff to surrounding areas and this in turn would lead to flooding problems. Drainage is already terrible behind the residential properties, upheaval to the area would result in it being worse. The fields are water-logged for most of the year and South Avenue often has floods.

Green Network and Core Paths

Standard letter: 520, 521, 522, 523, 524, 525, 526, 527, 528, 530, 531, 532, 533, 534,

535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 1775, 1790, 1791, 1792, 1793, 1794.

Other Representations: 252, 390, 391, 421, 438, 446, 479, 512, 1775, 1816, 1825, 1831, 1833, 1852, 1862, 1895, 1897, 1899, 1904, 1909, 1910, 1911, 1942, 1945, 1950, 1959, 1962, 1963, 1964, 2105

It would be contrary to the policy of promoting green networks and the land and network of paths would be lost for recreational use which is contrary to Renfrewshire's Core Paths Plan (CD/54). A thriving, interesting and accessible natural environment has become an essential factor in people's perceptions of their quality of life. This area is self maintaining parkland for local communities. Loss of an accessible, valuable amenity area which is heavily used by dog walkers and people pursuing outdoor activities.

Impact on character and amenity

232, 235, 284, 416, 252, 257, 284, 289, 290, 291, 309, 327, 329, 330, 337, 377, 389, 390, 391, 392, 416, 421, 426, 429, 435, 438, 439, 442, 445, 450, 486, 490, 500, 1775, 1816, 1825, 1831, 1833, 1834, 1835, 1837, 1838, 1845, 1847, 1850, 1852, 1858, 1891, 1895, 1897, 1904, 1909, 1910, 1911, 1926, 1929, 1935, 1943, 1944, 1947, 1951, 1961, 1962, 1963, 1965

The plan appears to consider this area as suitable for housing development, this will be detrimental to this community as it is out of character in terms of its appearance compared with existing development in the vicinity and will compromise the integrity and unique architectural qualities in Thornly Park and the Conservation Area. It will affect the character and aspect of Paisley South causing noise and disturbance, overshadowing, over development, loss of existing views and loss of privacy. The disruption and noise caused by construction activity, for hundreds of houses over many years is also of great concern. Potential for an unacceptable high density development. It would be detrimental to the settings of Dykebar Hospital's listed buildings and the Thornly Park Conservation Area. It will adversely impact on the community atmosphere for those that current live here. Existing property prices would be driven down and the area would become vastly over populated. Low cost housing in this area will impact on house pricing in the neighbourhood which is a sought after area.

Candida Milard (448)

No objection to some sympathetic development on land that formerly contained buildings e.g. the old hospital site at Dykebar, tennis courts on Thornly Park Avenue.

Duncan McIntosh (1891)

The prospects for the conversion of the vacated listed buildings of Dykebar Hospital are greater if they remain in the green belt.

Procedures

Francis Murray (382), Jan Forrest (438), Fiona McLaughlin (473), V Lyall (515), Dorothy Kerr (524), Alex Morrison (536), H Ballantyne (572), Fiona Nuttall (1280), P E McNally

(1775), Anne Gillespie (1813), Peter Dixon (1816), Ann and John Cameron (1823), Sandra Barr (1825), Joseph Barr (1831), Robert Todd (1833), E D Pringle and E A Pringle (1852), Grant and Jennifer Ballantyne (1869), Gordon Matthew (1881), Gerald Dolan (1894), May Begg (1887), Alistair Muir (1889), Anna Muir (1890), James Pope (1892), Bob and Elizabeth Meikle (1893), Gerald Dolan (1894), Mary E Park (1895), James and Jessie MacKenzie (1896), Alison and Scott Wright (1897), Linda Barrett (1904), S Hucker (1909), A Barrett (1910), Stuart McAllister (1911), C and F Oswald (1932), Joe and Sylvia Egan (1936), Kerry Ramsay (1948), Donald and Jean Isaacs (1951), June Ramsay (1954), Kate McVey (1955), Lindsay & Paul O'Neill (1962)

Consultation process was shamefully inadequate. The consultation regulation of only notifying residents within 20 metres of boundaries is severely lacking in scope for a project of this scale and potential effect on the much wider community. Should have included more than just the 151 within 20 metres of the area. Lack of transparency from the council. Suspicious of how many residents will actually be affected and how many residents have been notified. Was only made aware of the publication by default. The views of people in the area should be taken into account as per the new regulations.

There are thousands of people in this area of Paisley whose daily life will be adversely impacted if this goes ahead. This met the legal requirement but does not excuse the fact that thousands of people deserved to know about the potential project. Would appreciate an explanation as to how the council selected who should be informed and who they assumed didn't need to know.

Very short timescales for the consultation period which is unacceptable.

Kirsty Watters (1917), Julie Reid (1919)

Concerned over the lack of notice given to local residents and although they received the letter as it came addressed to the owner, occupier or lessee they binned it as it looked like junk mail.

Kirsten Ferguson (1963)

Residents in the Thornly Park area of Paisley seem to have been consulted in a very disparate and disjointed way. As a local resident of this area I am extremely concerned about the 'quiet' consultation process regarding this proposal. Also shocked by the fundamentally flawed process of consultation. A wider scale of consultation should have occurred to ensure widespread knowledge and understanding of the council's plans, and to consult with the local residents in a fair, open and democratic manner. It seems that no such process was followed, and a rather covert and divisive practise was used to 'consult' local residents. There are other effective ways of raising awareness of important issues affecting residents in Renfrewshire, such as Facebook, Twitter, council websites etc.

Councillor Paul Mack (2105)

The process of alerting statutory consultees has been found wanting. Many organisations and community groups would be appalled at the mere suggestion of this proposal. For example, RSPB, Barrhead Riding Club, Hunterhill Community Council, White card Credit union et al.

Flora McPhail (312), Alan Gillies (439),

The plan is very misleading to everyone reading it and makes it impossible to know exactly what areas may actually be built on. Without this information it is impossible to object to the specific geographical possibilities for building houses, as the area is so large and contains individual areas of land that should not have been included.

Gillian McCarney (216), Henry N McLaren (1958)

The Main Issues Report (MIR) (CD/05) prepared by Renfrewshire Council made no mention of this expansion area. This should have formed part of the MIR to allow a reasoned justification for the need and meaningful consultation with residents and consultees. There is nothing in the MIR, the plethora of Background Reports or in the proposed LDP to suggest a valid planning justification for the principle of such an expansive housing land release. The council has not been transparent and has not followed proper procedures.

Duncan McIntosh (1891)

Proper planning procedures have not been followed and as such the expansion area should have been included in the Main Issues Report (CD/05). The expansion area is stated as being for long term residential expansion yet is included within the sites that could be developed before 2025. The Master Plan is scheduled for 2015 which is not longer term. The Council has conflict of interest as it will benefit from capital receipts of the site.

Alan Reid (1814)

Notes that in the LDP Action Programme (CD/01) assessment of such is to take place in 2014-15 although the policy states that it is identified as a possible long term residential expansion of Paisley should such an investigation find in favour of residential land release. Site was also not include in the Main Issues Report (CD/05) and did not form part of the assessment process for the many development sites that were assessed against environmental criteria. No courtesy has been extended to the general public in respect of views being sought on such a significant potential impact for the south side of Paisley except at this very late stage in the Plan's evolution. This is a significant procedural flaw.

Henry N McLaren (1958)

Circular 1/09 (CD/51) and the council's own Participation Statement (CD/47) have not been used as reference points by Renfrewshire Council in preparing the proposed Local Development Plan (LDP).

There is nothing in the MIR (CD/05), the plethora of Background Reports or in the proposed LDP to suggest a valid planning justification for the principle of such an expansive housing land release. As one of the plan's 'big ideas', it should have been raised earlier. It struggles to reflect the ambitions of the Glasgow and the Clyde Valley Strategic Development Plan (CD/02).

The Strategic Greenbelt Review Background Paper (CD/49) suggests that the council does not envisage the area at Paisley South being developed in the plan period, and the position will be reviewed in the next LDP. Therefore, why is it in this plan, other than to

offer the site to the market? It is difficult to reconcile open and inclusive planning with parachuting a policy of this magnitude into the proposed LDP with the bare minimum time period for public comment. There is an impression that Government guidance and the whole ethos of an inclusive planning system are being disregarded.

Homes for Scotland (2085)

The council suggest the identification of the Paisley South Expansion Area to complete the housing allocations and provide some flexibility, depending on the scale of the release. This option did not appear in the Main Issues Report (MIR) (CD/05) ; indeed site proposals to the south of Paisley were specifically rejected in the MIR. It is described as a "long-term" site, though this is not defined. There is no evidence presented to say if, when and by whom it might be delivered.

Stewart Milne Homes (SMH) (1883)

There has been no previous mention of such an expansion area at Paisley South in any of the preceding LDP documents, including the Main Issues Report (CD/05). It has not been subject to the same consideration and evaluation as all other sites put to the council. There is no background information whatsoever regarding the assessment of the site. All that there appears to be is a statement within LDP Policy P6 noting that "the area will be the subject of a study". Given the lack of any sound evaluation or assessment of the Paisley South Expansion Area, SMH objects to the inclusion of Policy P6 and the identification of the expansion area on the proposed LDP Proposals Map.

General Comments

East Renfrewshire Council (1940)

Note that Paisley South Expansion Area has been identified as a possible long-term residential expansion to Paisley and that the area will be the subject of a study. This particular site appears not to have been promoted at the Main Issues Report (MIR) (CD/05) stage. However in the event that established uses at Dykebar Hospital and University of Paisley Thornly Park Campus, are subject to change, it is acknowledged that a rationale exists for potential redevelopment of these sites and their immediate surrounds. As part of any study associated with this proposed Expansion Area, any new greenbelt edge between the south of Paisley and Barrhead, should be strong, robust and defensible and should deter future coalescence of settlements. In addition, would expect that the form, character and scale of any new development within this proposed Expansion Area should reflect the edge of settlement location and its landscape sensitivity. It should provide opportunities for extension of the green network including access and biodiversity.

Marian McGlinchey (449)

Selling off public property to private developers is not the solution to tackle derelict land, buildings or vandalism.

Mr and Mrs Scales (1877)

The largest part belongs to the council which will gain from the sale to developers.

Callum McGaw (1960)

Objections to the proposed selling off of the land for development.

Henry N McLaren (1958)

Some development towards the eastern end of the proposed zone would be acceptable, in the immediate vicinity of, and in the grounds themselves of Dykebar Hospital as and when such land becomes available once it is no longer required by the NHS. These areas could largely be classed as brownfield land, would still provide more than enough additional land.

Drs A and J Dowie (1944)

Railway cutting in plan may have been used as a landfill site in the recent past. Not suitable for building on.

James and Jessie MacKenzie (1896)

Destruction of the University Playing fields

Alan Reid (1814)

If this area was to be developed it would be like bolting a small sized town like Linwood or Bridge of Weir onto the side of Paisley and is not dissimilar in context and significance to the Community Growth Area at Bishopton and Johnstone South West which form an integral part of the Development Plan.

Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112)

Cala Homes West (2114)

Persimmon Homes (186)

It is not necessary for this proposed LDP to present the Paisley South Expansion Area as part of the housing land supply. This can be seen as an 'opportunity' for housing development and should not be included until its effectiveness is determined. However, this site could make up part of the generous land supply.

Modifications sought by those submitting representations:

The representees who submitted a standard letter made no explicit reference to how the plan should be modified.

Adjust the wording of Schedule 1 P30 to allow inclusion of sites in the green belt that are still in use. Its inclusion in the Schedule wouldn't compromise the University's commitment to work with the Council and other parties to deliver Paisley South. The site omits the field to the north of UWS campus which should also be incorporated into the allocation (89)

Exclude Shaw Wood and a 50 metre buffer area from the Expansion Area (184)

This Policy should be withdrawn/removed and the Council should follow proper procedures and consultation requirements and include it in the next Main Issues Report in

a transparent and upfront way (216)

The areas of demolished housing in Thrushcraigs should be replaced (284)

Other areas in Paisley should be upgraded rather than using the green belt area. (287)

Retain as green belt (309 343 377 389)

Omit Policy P6 from the Plan (330)

Housing would be better contained and better visually on the environment if left with more green belt around them. Build on flat land not imposing into views of others homes and gardens (337)

Drastically reduce the total number of houses available, promote and create play and outdoor activity areas, create a better park (392)

Area must be retained and even better would be to incorporate it into the Gleniffer Braes Country Park (421)

Do not build on this area. Brownfield and existing redundant/cleared sites should be the first option (428)

Use alternative areas in Paisley for example Skye Crescent where houses were originally built and knocked down. The Arnotts site, the two Tesco sites. Surely it would be beneficial to use town centre sites rather than a green belt area and would be less costly (429)

Use existing brownfield sites in the PA2 postal district. There has been a demolition of flats in Thrushcraigs, Glenburn, Todholm and Foxbar. These sites could be utilised for house building as they have existing amenities and transport links. If the new development is intended for affordable housing this may prove to be a better solution than a very large estate on the very fringes of the town (435)

There are many areas in Paisley where houses have been demolished and nothing built to replace them (436)

As we have no definitive details of the plan, scale, number of properties, specific access points. We have a countryside/ rural aspect and we would wish to maintain this and for the wildlife. Appreciate that demand for housing has to be met, but not at the expense and disadvantage of current home-owners and wildlife (438)

Amend Policy P6 to read 'Land to the south of Thornly Park and Dykebar is identified as a possible long term residential expansion to Paisley. The general location of the area is indicated on the proposals map. The area will be the subject of a study. This site is an 'opportunity' and will not be considered part of the housing land supply until its deliverability and effectiveness is proven. This site will assist the Council to provide a generous land supply to 2025 (2109)

The plan should be scrapped completely and the green belt area left alone. (439)

The Plan should immediately be abandoned and alternative brown field sites sought and

developed. If we do otherwise we are giving a consideration to a needless increase in urban sprawl and the destruction of a vital, valuable and interesting natural habitat by what amounts to nothing more than an act of senseless vandalism. (446)

Remove this suggested expansion area from the plan. (448)

Land to the south of Thornly Park and Dykebar will retain its current status as green belt. (449)

Remove area shown on Map E of the Local Development Plan as an expansion area and show it as green belt. (480)

More emphasis should be placed on building on brownfield sites rather than on greenfield ones. (486)

Delete the proposal to develop the land as covered by Policy P6 and retain the land as designated green belt (500)

The area marked/ hatched as Policy P6, rezoning of green belt to land identified as a possible long term residential expansion to Paisley should be entirely removed and the green belt designation reinstated. (511)

Keep the space as it is, a wedge between Paisley and Barrhead for the use of all residents or use it for green, local energy production. (516)

Remove Policy P6 from the LDP. Remove sub section future delivery of an optimistic Growth Strategy. Change LDP Map E by removing reference to Policy P6. Remove number 51 from the LDP Action Programme and remove all reference to the Paisley South Expansion Area in accompanying LDP supporting documents. (1814, 1958)

Reduce the re-designation of use area to the area immediately surrounding Dykebar Hospital at the Eastern extremity of the proposed area. (1816)

No amendments required (186)

Delete the proposal to develop the land as covered by Policy P6 and retain the land as designated green belt. (1845)

Delete the proposal to develop the land as covered by POLICY P6 and retain the land as designated green belt. (1913)

Development limited to Dykebar hospital with caveats that, wherever possible, the beautiful, old characteristic buildings are renovated as opposed to demolished. (1917, 1919)

Use existing land in Paisley for any required additional residential developments. Leave the green belt alone. (1922)

Leave the green belt untouched and use the many areas within the existing Paisley area that have been demolished for redevelopment. The existing services etc must make this a better long term solution to increase the housing in the area if that is the requirement. (1930)

The Proposed Plan should be amended to include additional land to the south of the Paisley South Expansion area. (1956)

Many sites have been identified as suitable for housing that are more in keeping with the Council's policy of redeveloping brownfield sites. I also note that the Paisley South expansion area includes Thornly Park Campus including the sports grounds. This is surely a major asset to Paisley in its present form rather than as a site for housing which could be built elsewhere. (1957)

Delete the sub section "Future Delivery of an Optimistic Growth Strategy" and Policy P6. Amend LDP Map E by removing all reference to Policy P6. (1958)

Council should present to the Examination an assessment of the established land supply to identify those sites which have a realistic potential for delivering housing in the Plan period. (2085)

Policy P6 and the Paisley South Expansion Area, on the Proposals Map, should be deleted. (1883)

No explicit modification sought. (232, 235, 252, 257, 289, 290, 291 312, 326, 327, 329, 341, 342, 353, 382, 388, 390, 391, 416, 426, 434, 442, 445, 450, 462, 473, 477, 479, 483, 487, 490, 508, 510, 512, 515, 524, 536, 572, 1280, 1775, 1811, 1813, 1815, 1823, 1824, 1825, 1831, 1833, 1834, 1835, 1837, 1838, 1839, 1847, 1849, 1850, 1852, 1855, 1858, 1861, 1862, 1868, 1869, 1872, 1874, 1875, 1877, 1879, 1881, 1884, 1887, 1888, 1889, 1890, 1891, 1892, 1893, 1894, 1895, 1896, 1897, 1899, 1901, 1904, 1909, 1910, 1911, 1925, 1926, 1927, 1928, 1929, 1932, 1934, 1935, 1936, 1938, 1940, 1942, 1943, 1944, 1945, 1946, 1947, 1948, 1949, 1950, 1951, 1954, 1955, 1959, 1960, 1961, 1962, 1963, 1964, 1965)

Summary of responses (including reasons) by planning authority:

Support (89, 186, 1956)

Support is noted and welcomed. A masterplan approach will require all parties to work together to create a strong community and place.

General case/Justification for Policy P6

The Paisley South Expansion Area is required to contribute to the provision of a generous supply of land in accordance with Scottish Planning Policy (CD/03). As set out in the proposed LDP, the established land supply together with Housing Action Programme sites were insufficient to meet the requirements for a generous housing land supply. Therefore additional land through the release of green belt sites was required. The 9 green belt sites (Policy P3) together with Paisley South Expansion Area provides this generous supply by a margin of 8.5%.

When the Main Issues Report (CD/05) and the proposed LDP were out for consultation there was no clear guidance on what might constitute a "generous" supply of housing land. In the consultation draft of Scottish Planning Policy (CD/46) there is an indication that a generous land supply should be in the region of 10% to 20% above the housing supply target.

The Glasgow and the Clyde Valley Strategic Development Plan (GCVSDP) (CD/02) (paragraph 4.71) concluded that the strategic development planning authority had identified a generous land supply to meet the projected demand for private sector housing. For Renfrewshire, the figures projected in the indicative all-tenure housing requirement as stated in the GCVSDP were considered to provide a degree of generosity given that the projected private sector completion rates (745 per annum) was more than 100 units per annum above the average (10 year) private sector completions (630 per annum). In fact completion rates higher than 700 units per annum have not been achieved since 1997 – 1998. Taking this into account, the council felt that providing sites to meet the generosity of 20% was not required and that providing land that would deliver closer to 10% provided a generous supply of land.

In identifying land to meet the generosity provision in the proposed LDP, there were two defining issues as to why the area at Paisley South was identified. These were:

- The medium to long term future of two relatively large sites at the UWS Campus and Dykebar Hospital located on the southern entrance to Paisley; and,
- The ability to implement infrastructure to successfully deliver additional housing sites.

In the strategic green belt review (CD/49) a decision was taken that all brownfield sites in the green belt should be removed from this zoning as it was considered that the green belt zoning was no longer appropriate. At the time of preparing the proposed LDP, the NHS, owners of Dykebar Hospital had approached the council to suggest that the hospital site would be winding up its operations over time in order to avoid duplication of services/facilities at the New South Glasgow Hospital that is currently replacing the Glasgow Southern General. The council considered that with the UWS vacating their campus site off Caplethill Road and Dykebar Hospital winding up its operations there were going to be two large vacant brownfield sites adjacent to the urban area in the green belt. As individual development sites, these are good sites for redevelopment, but the council considered that if they were developed separately this would leave an area in-between both sites which over time would have been the subject of development pressure and may have resulted in separate planning applications being submitted for housing on small parts of the site, in a more ad-hoc, disjointed nature. The council consider that by identifying the site as a whole, a co-ordinated, comprehensive development of the site is more likely to achieve good quality development by taking a design-led approach to the future planning of the area. There are some important listed buildings within the Dykebar Hospital grounds as well as some good sports pitches within the UWS grounds which are assets to the area for which the council would like to see a positive future.

It was considered that development of these sites presents a great opportunity to connect and integrate development with the existing built up area. It is recognised that there could be significant advantages to connecting these sites to the blue and green networks that flow between each site, providing enhanced access. Given that the land in-between the UWS and NHS ground was owned by the council, in terms of the effectiveness tests as set out in PAN 2/2010 (CD/42), the site would be in the ownership and control of the parties which can be expected to release it for development. It should be noted that the 3 parties are agreeing a Memorandum of Understanding in place which has will be signed by all 3 parties committing them to working together to develop the site.

All sites that were submitted through the Suggestions for Land Use Change exercise were considered when looking to allocate a generous housing land supply. There were sites that could have been identified across Renfrewshire, (Summary of analysis work is found in the addendum housing paper) (CD/40). This would have resulted in a spread of 4 or 5 medium to large housing development sites in the towns and villages across Renfrewshire. When assessing each of the potential development sites, in accordance with Scottish Planning Policy (CD/03) (paragraph 80) it was considered that Paisley South was more appropriate given the following:

- The redevelopment of two brownfield sites in the green belt would comply more with the Council's spatial strategy and policies of the development plan;
- The site presents good accessibility to a choice of travel options;
- The development of one large site would allow delivery of infrastructure, services and facilities by a number of developers which would present a more cost effective option and less risk to developers;
- A high standard of design and quality of development would be achieved through a masterplan approach;
- Should there be any impacts of the proposed development they would be contained and be capable of action, remediation and mitigation concerning only one site rather than the cumulative impact caused by multi housing development sites which is likely to be harder to control.

In relation to the development approach required to take this site forward, the council have undertaken a planning sustainability assessment (CD/06) and a strategic environmental assessment (CD/07) in line with the assessment of all other housing development sites submitted to the council during the preparation of the plan. An effectiveness test has been undertaken in line with PAN 2/2010 (CD/42) and this is detailed in the addendum to the housing paper (CD/40). All key agencies and service providers have been consulted and have commented on the inclusion of the site and there have not been any adverse comments from the initial consultation. A scoping study with require to be undertaken to establish the parameters of the masterplan as well as identifying data requirements and investigations that will need to be carried out. The masterplan will be a partnership approach which will involve not only the land owners but the surrounding community, potential developers, key agencies, adjoining local authorities, etc.

For these reasons and in light of the further assessment work undertaken, which is provided in the addendum to the housing paper (CD/40), it was considered that the mix of greenfield and brownfield land at Paisley South presents an excellent opportunity for a green belt release in Paisley which accurately reflects the size and scale able to be accommodated in the largest urban area within Renfrewshire.

Since the consultation on the proposed LDP, the publication of the draft Scottish Planning Policy (CD/46), the further assessment work that has been undertaken in assessing the site along with continual discussions with the NHS and UWS, the council considers that Policy P6 requires to be reworded along with an alteration to Table 4 (page 27) in the proposed LDP which states that the indicative capacity at the site should be 1000 units. The alterations would be as follows:

POLICY P6 – Paisley South Expansion Area

Land to the south of Thornly Park and Dykebar is allocated as a site to provide medium to long term residential expansion to Paisley. The general location and

area for development is indicated on the proposals map. The area will be subject to a masterplan wherein the details will be brought forward and presented as part of the preparation of the next local development plan.

Table 4: Meeting the Housing Land Requirement to 2025

Housing Action Programme Sites	Additional housing sites identified in the LDP	Paisley South Expansion Area – medium to long term site)	Total Land Supply to 2025
1414	543	1000	1000 units above the identified all tenure housing requirement

If the reporter was so minded, the wording in the proposed LDP could be changed to reflect the fact that Paisley South Expansion Area is required to comply with Scottish Planning Policy as provide a generous housing land supply for at least 10 years from the date of adoption in the plan.

Green belt and Landscape Character

Over 74% of the Renfrewshire Council area is designated as green belt. It is agreed that green belt is an asset to the area but it is not a scarce resource. If all of the allocated land indicated under Policy P6 on the proposals maps was to be developed, which is not anticipated (as discussed below), this would reduce the designated green belt by only 0.6%. The designated green belt has actually increased in the proposed LDP from the adopted Renfrewshire Local Plan (2006). In the 2006 Renfrewshire Local Plan, 19,776 hectares of land are designated as green belt, and in the Renfrewshire proposed LDP 20,003 hectares of land are designated as green belt. This includes, the deduction of all of the land associated with Paisley South Expansion Area and the nine green belt sites included in the list of sites within Policy P3. The reason for this is that the council has put land back into the green belt at Bishopton and Erskine which was previously allocated for development. For the reasons above we would disagree that the green belt is a scarce resource.

The development of green belt land is not contrary to policy. Scottish Planning Policy (CD/03) (paragraph 159) states green belt designation should be used to direct development to suitable locations, not to prevent development from happening. This is also reiterated in the GCVSDP (CD/02) (paragraph 4.48). Policy ENV1 in the proposed LDP indicates that the green belt will identify appropriate locations to support growth and that appropriate development will be considered acceptable where it can be demonstrated that it is a positive addition to an area and complies with criteria set out in the New Development Supplementary Guidance (SG) (CD/09). The green belt designation is not in place to prevent development. The proposed LDP has followed the objectives, principles and policies set out at the national, strategic and local level and aims to achieve sustainable economic growth within Renfrewshire attracting investment across the area and identifying growth in the most sustainable locations.

The council does not consider that identifying the site at Paisley South will set a

precedent for further green belt release. There is a particular requirement in this plan period to identify additional housing land. In the preparation of each future LDP there will be a continuous review of the housing land supply and where the housing requirements are not or cannot be met by the current supply of identified housing land then sites will require to be identified, assessed and put out to consultation. Specifically in relation to the site at Paisley South, there is an established clearly identifiable visual boundary based on landscape features, vegetation and trees at the site. Developing this site will not set a precedent for developing more land further south.

The site has not been identified as prime agricultural land or land that has been categorised by the Macaulay Landuse Research Institute as Class 1, 2.1 or 3.1 and therefore is not excluded from development. Development of this site would not prevent the surrounding fields from being actively farmed.

Chris Johnstone (516)

Facilities for energy generation and distribution as well as waste management are considered important to reduce greenhouse gas emissions, promote sustainable economic growth and can be seen as an investment in an area. However sites identified for this particular use are best co-located next to uses with a continuous demand for energy. Residential use (adjacent to the Paisley South area) does not have a high and continuous requirement for energy. There are other sites within Renfrewshire that are considered more appropriate for these types of facilities and therefore the land at Paisley South would not be required or considered appropriate for such uses.

Lindsay & Paul O'Neill (1962)

It is considered that given the size of Paisley, the existing network of connections, facilities and services that this is a logical extension to the town. It is appreciated that the respondent finds this a valuable area of land in terms of landscape character and setting and it is considered through the initial assessments undertaken and site visits conducted that many of the existing landscape features can be retained and enhanced with housing interspersed throughout. The council would aim for any development to comply with Policy P1, P7, P8 and Policies ENV 1 to 4 as well as the criteria set out in the New Development Supplementary Guidance (CD/09).

Coalescence between Paisley and Barrhead

Although the inclusion of the land at Paisley South will bring the southern boundary of Paisley closer to the boundary shared with East Renfrewshire Council, development of the site will not result in coalescence. A significant wedge of green fields would remain after development.

Greenfield/Brownfield

The spatial strategy as outlined in the proposed LDP indicates that the total greenfield release will amount to 12% of the total housing land proposed for development. Therefore there will still be a significant 88% of the housing land proposed on brownfield land.

There are a number of vacant and derelict sites within urban areas. The housing land supply within the proposed LDP contains all of the vacant and derelict brownfield land that is considered suitable for residential development. A number of the existing

brownfield sites within the middle of communities have been vacant for some time and therefore the council is taking a positive approach to try to support and facilitate development on these sites. This proactive approach was outlined in the proposed LDP by the inclusion of LDP Action Programme sites through Policy P4 and since the publication of the plan, work has commenced by investigating different delivery mechanisms and partnership approaches to try and develop these sustainable sites in existing communities.

Land for 1000 residential units is required to provide a generous supply. There are not enough brownfield sites across Renfrewshire to meet the housing need and demand as well as providing a range and choice of housing land and ensuring a generous supply. Allocation of Paisley South will not undermine the policy of developing brownfield first. The emphasis on brownfield land is clearly central to the proposed LDP spatial strategy and the council is committed, through various actions in the LDP Action Programme (CD/01), to helping to support and deliver development on brownfield sites as part of the placemaking focus which is also central to the LDP Spatial Strategy.

Kirsten Ferguson (1963)

It is agreed that the current economic circumstances are having an impact on the sale of houses. However SPP (CD/03) (paragraph 76) states that the functioning of the housing market is outwith the direct control of the planning authority. The planning system is required to help address the challenges facing the housing sector by providing sufficient land for housing. The plan takes a positive and flexible approach to encourage investment through house building. The Paisley South Expansion Area is considered to be central to this approach by providing additional land over and above the housing need and demand forecasts.

Councillor Paul Mack (2105)

It is agreed that there are a number of important listed buildings and other existing vacant buildings throughout Renfrewshire that would be appropriate for residential use. Almost all of those considered appropriate for residential development are included as part of the existing housing land supply but this supply is insufficient on its own to meet the housing requirement. The council have over the years been proactive in trying to get new uses into these buildings. Various actions within the LDP Action Programme (CD/01) will continue this work using alternative approaches to marketing, along with various support mechanisms and adopting a flexible approach by allowing a range of development options to be accepted.

Provision of services and facilities

The large scale development proposed will enable a range of facilities to be provided on-site such as schools, local shops and other community facilities, therefore reducing the need to travel. The economies of scale associated with the size of the proposal will therefore result in a more sustainable development.

Again through a masterplan approach and a partnership with all service and utility providers, landowners, developers and house builders, the correct level of provision to serve this area as well as existing communities will be investigated and assessed in developing this site further.

William, Ann and Alan Armstrong (1858)

The proposed LDP requires to work towards achieving an optimistic growth scenario in line with the GCVSDP (CD/02) and therefore to sustain and encourage population growth we consider such development will support this aim as well as benefit the local economy.

Drs A and J Dowie (1944) Employment/services

A key aim of the proposed LDP's spatial strategy is supporting development which will result in sustainable economic growth. The plan seeks to facilitate a dynamic and growing economy that will help to provide land for a range of employment opportunities in particular the area around Glasgow Airport, Hillington, Renfrew North and Bishopton, all of which have been identified as Strategic Economic Investment Locations in the GCVSDP (CD/02). These areas are identified to support all scales and types of investment, in particular key sectors of the Scottish economy. We disagree that there is a lack of employment opportunities and consider that the flexible and supportive approach to development adopted by the proposed LDP will ensure additional employment opportunities in the future to support developments such as the Paisley South Expansion Area.

Traffic and Roads

The impact on the existing local road network and road junctions will require to be analysed through a transport assessment, assessing all relevant transport impacts and considering appropriate mitigation where relevant. Any additional infrastructure works required for the site or in the vicinity of the site would require to be identified and set out in the masterplan to provide certainty and transparency of these requirements to any developers.

Biodiversity, flora and fauna

The masterplanning process will enable consideration of the protection and improvement of the natural environments, its inhabitants as well as the water environment. Within the proposed LDP all of the policies within the Environment section promote maintenance and enhancement of the assets in Renfrewshire. An initial high level strategic environmental assessment has been undertaken and is contained in the addendum to the housing paper (CD/40). There is a need for a detailed study of biodiversity, flora and fauna to be undertaken. In line with the policies within the LDP and New Development SG (CD/09) there is a requirement to protect, mitigate and enhance the natural and water environment of this site and this will be clearly outlined in the masterplan and at the detailed planning application stage.

As outlined above the existing green and blue networks interspersed throughout the sites are an important feature and will remain central to the overall development of this place.

Some trees will inevitably be lost in any development. A tree survey will be undertaken and those that require retention will be highlighted with measures to protect them put in place. The loss of trees will require to be compensated by a good, well structured landscape scheme. Impact on trees would also require to be considered in the context of any planning application in due course.

RSPB (184), Neil McGovern (1925), Neil Grant (1928), Mary Ryan (1942)

Shaw Wood located on council land to the northern boundary of the site is identified as a Site of Importance for Nature Conservation (SINC). This is an important feature in this area and any development will require to ensure no significant effect on the nature conservation value of the site and mitigatory measures will be sought to ensure its protection. The detailed study work will outline areas for protection and mitigation for the entire site as well as Shaw Wood.

Flooding

The council is aware of the general drainage and flooding aspects of the site and where development can and cannot occur. An initial assessment has been undertaken using information held by the council as well as an initial analysis by SEPA. The water environment is a valuable feature which runs through the site which is a tributary to the Tod Burn and the Tod Burn itself which is at the northern section of the site. A flood risk assessment along with a drainage assessment will be undertaken as part of the study ensuring that the flooding and drainage issues are clearly identified with mitigatory measures identified. By incorporation and construction of a comprehensive drainage scheme such as sustainable urban drainage systems through pond, basins, swales, etc, this will also control the water run-off to surrounding sites and areas downstream of the site which will result in betterment for the overall area.

Green Network and Core Paths

As indicated above the green network is a strong feature on this site which should not be lost through development. The core path network, informal trails through the site as well as corridors for species dispersal. In developing the masterplan this will be a central feature to the development. Development of the site will provide an opportunity to enhance the existing core paths and networks through the area bringing them up to a good standard and allowing access for all.

Impact on Character and Amenity

As placemaking is central to national, strategic and local policy and guidance, a development of this scale at this location presents opportunities to create a good quality development with a design-led approach through the masterplan. A range of different house types, styles and sizes will be required providing an opportunity to create a place which is diverse and could deliver a mixed community with a range of densities and tenures to accommodate future housing need and demand. There is no indication of the exact tenure of housing proposed for the site, this will require to be investigated. The masterplan would encourage a development which integrates well with the surrounding area but without impacting adversely on the integrity or architectural qualities that exist in the area.

Candida Milard (448)

Sympathetic development of the site will be sought through the masterplan.

Duncan McIntosh (1891)

The masterplanned approach will ensure that the conversion of the vacant listed buildings

is sensitively managed. We would disagree that retaining the land at Dykebar Hospital in the green belt would enhance the chances of conversion of the listed buildings. As the listed buildings are statutorily protected, conversion of the building to a suitable use in any location, brownfield or greenfield is the desired outcome in order to retain the listed building.

Procedures

All relevant legal requirements were met. The neighbour notification undertaken for the Proposed LDP was in accordance with the Town and Country Planning (Development Planning) (Scotland) Regulations 2008 (CD/56), Part 3, S14. The consultation process was also undertaken in accordance with the Regulations as well as the guidance set out in Circular 1/2009 Development Planning (CD/51). The council is disappointed to hear that many respondents found the consultation process inadequate. As well as neighbour notification to all within 20 metres of the site, a copy of the proposed LDP was given to each councillor in the area, and each community council, and a copy of the plan was deposited at each library and at the council headquarters. In addition a feature on the proposed LDP was placed on the front page of the council's website, the consultation page of the website as well as the front planning pages of the website. Twitter and Facebook messages were sent to those that sign up for such electronic updates from the council.

When the council heard of the concern in the area surrounding Paisley South, the council informed the local councillor that they would extend the period for consultations by an extra week and in fact late representations were accepted for a period beyond that additional week extension to the consultation period. Therefore we feel that there was an adequate and reasonable opportunity for the local community to look at the plan and comment.

The council has complied with all elements of the consultation framework as set out in the Participation Statement contained within the Development Plan Scheme (CD/47). We consider that all statutory requirements in relation to the content of, and consultation on the Main Issues Report (MIR) (CD/05) were met, and the policy requirements of Circular 1/2009 (CD/51) were followed. The background to the inclusion of Paisley South as an allocated site within the proposed LDP is set out at the beginning of the council's response to this issue. It is important to note that the MIR is not intended to be a draft plan. The MIR set out the council's preferred strategy (and reasonable alternatives) and the core elements of that strategy remain unchanged as presented in the proposed LDP.

The emergence of Paisley South at the proposed LDP stage has not prejudiced any interested party. Any interested party will have had the opportunity to submit a representation on the proposed LDP, and any party wishing to promote a particular site has had the opportunity to do so at the Suggestions for Land Use Change stage, or in response to consultation at the MIR.

General Comments

East Renfrewshire Council (1940)

We welcome the comments from East Renfrewshire Council and their acknowledgment of the reason for including Paisley South Expansion Area in the proposed LDP.

Marian McGlinchey (449), Mr & Mrs Scales (1877), Callum McGaw (1960)

The allocation of the site is not driven by prospect of future sales/receipts. The site has been assessed as potentially appropriate to contribute to generous housing land supply. However the various ownerships comprising the site are relevant to development opportunity and council's ownership will assist in delivery through various mechanisms available.

Henry N McLaren (1958)

The collective work toward the masterplan will identify the most appropriate areas for development. We would agree that the existing land owned by the UWS and the NHS will be central to what is considered as the developable part of the site. But by simply identifying the brownfield sites of UWS and Dykebar Hospital would be short sighted as the council considers that development of this area is more than just providing the number of houses required to meet a generous supply of land.

Drs A and J Dowie (1944)

Previous areas of contaminated land such as the old railway cutting will be investigated and mitigatory measure will be put in place to resolve any issues as required.

James and Jessie MacKenzie (1896)

The council recognise that the playing fields associated with the UWS campus are an asset to the area and will explore if these can be retained or relocated as part of the overall development.

Alan Reid (1814)

The development of this site will require to be fully integrated with the surrounding area facilitated by the masterplan. It will not simply be bolted on to the side of the existing area. As we have seen from the last green belt release at Dykebar, this residential area is now considered part of Paisley, which has successfully integrated with the existing built form and brought a variety of house types, sizes and tenure to the area. We would agree that the size of the site identified is similar to the Community Growth Area at Johnstone South West although much smaller than ROF Bishopton site. Both sites have benefited from a masterplan approach which is what is proposed at Paisley South.

Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112)

The reason for including the site at the proposed LDP stage is well documented above.

Reporter's conclusions:

1. I have dealt with the Green Belt under issue 42 of this report. Essentially, I have found that the green belt in Renfrewshire should not be released lightly, because it continues to serve an important spatial and environmental function and, in particular, because the proposed plan's focus is on the re-use of brownfield land in the urban areas.
2. The Strategic Greenbelt Review of 2012, a background paper to the LDP, recognises that a limited release of green belt land was not essential in terms of the quantity of future

development land required during the lifetime of the LDP, but desirable to provide increased range, choice and generosity, and thereby providing flexibility, as indicated by the Scottish Government.

3. The review identified a small number of locations for release and another for further investigation and study for potential release in the LDP after this one. That is the Dykebar Hospital / West of Scotland University site at Paisley South. The review says that the allocation of sites within the area will be reviewed during the preparation of the second LDP.

4. Generally, housing land has been selected with a focus on previously developed land, existing built up areas and key development sites. The council says that the Paisley south expansion area was identified in preference to several alternatives in less sustainable locations. It takes in two brownfield sites on the urban edge.

5. The identified Paisley South Expansion Area is in the green belt. The council estimates only 0.6% of designated green belt would be lost, while, at the same time, the green belt has increased in size since the last local plan was adopted. However, an area measurement alone does not reflect the purposes of the green belt, as set out in SPP, which include to protect the identity of settlements or prevent coalescence. On those two criteria, the measure of almost halving the separation distance between Paisley and Barrhead would be more relevant. The green belt does not exist to prevent development but it should be used to direct planned growth to the most appropriate locations, which would be, in this case, previously developed sites in built up areas in accordance with the plan's spatial strategy. However, SPP also says that release of the green belt (where necessary) should be identified in the settlement strategy and development may be appropriate to meet an established need if no other suitable site is available.

6. This allocation was not identified in the Main Issues Report but appeared in the proposed LDP with the intention of providing a generous supply, over and above the requirements of the need and demand assessment. The reason given for the inclusion of Paisley South is that it is required to contribute to the provision of a generous supply of land in accordance with SPP. Under issue 17 I have found that the 8.5% generosity the council says it would provide would reasonably accord with SPP as it currently stands.

7. However, I have also found under issue 17 that the housing land supply requirement from the SDP cannot be met and that further sites will need to be identified through supplementary guidance. The generosity of supply will inevitably need to be recalculated once additional land is identified and in the light of any revisions to SPP when it emerges this year. In the meantime, the proposed Paisley South Expansion Area would not contribute to the effective 5-year supply, because it is at such an early stage of consideration. Further sites may need to come forward which would be able to deliver housing more quickly. That is likely, in turn, to add to the supply of housing and affect the generosity calculation. The justification for the Paisley South area as identified here may change considerably.

8. There is also much that is not yet defined. Logically, masterplanning would be at a later stage, yet part of the justification is that the scale of development would support the necessary infrastructure and services for a large number of houses. These have not been quantified yet. The environmental constraints on the site (such as Shaw Wood) have not been spatially defined and this may affect the number of houses that can be allocated to the land. Although council says further assessment has been undertaken to

confirm an indicative capacity of 1,000 units, document CD40 says that the site requires further investigation and a detailed study to assess its potential for residential development and that the exact impact on the natural environment cannot easily be indicated at this stage. In effect, there is more work to do before land to the south of Paisley can be realistically evaluated for its contribution to housing land supply.

9. Policy P6 indicates that the Paisley South Expansion Area is just a possible long term residential expansion to Paisley for further investigation in a review of the LDP. I consider that it can remain in the proposed plan now because there is no commitment in so doing. The precise boundaries and whether it should extend further or avoid certain areas can be determined at a later stage if it is taken forward in the review.

1011. Matters such as character and appearance, amenity, drainage, recreation, road traffic impact, the setting of listed buildings and access to the site should be considered at the masterplanning stage for the site, as would the protection of flora and fauna in the area. These concerns are addressed by other policies in the proposed plan. They do not affect my consideration of the principle of including the area as a policy in the proposed plan.

12. The comments in support of the proposed policy do not need to be examined here as they are not unresolved representations.

14. Many of the representations on this issue criticise the council for introducing this site at a late stage and with consequently poor consultation and notification. We have found that the council has consulted generally in accordance with its participation statement. The proposed expansion area is also at an early stage and its inclusion now is for investigation purposes. That will allow time for proper and meaningful consultation in due course.

Reporter's recommendations:

No modification

Appendix 1: Body or person(s) submitting a representation raising the issue (including reference number):	
<p> Craig Millar (520) Marian McCallum (521) Audrey McGeoch (522) Dorothy Bannatyne (523) Dorothy Kerr (524) Allan W (525) J Taylor (526) W Watson (527) David McGruther (528) Janis Wilson (530) Frances Bryce (531) Fiona Herron (532) Evan Willas (533) June Cunningham (534), A Korabinski (535) Alex Morrison (536) E Hislop (537) Janette Russell (538) Elaine Marquis (539) Jamie Borland (540) Ryan Wallace (541) Betty Clark (542) James Bolland (543) Stephen Fairbairn (544) Dr P Fletcher (545) John Bolland (546) Katrina A Gelston (547) Marie Meechan (548) J Carslans (549) Hannah McIntyre (550) Jordon J Crawford (551) Craig Devine (552) David Nicol (553) P Haldane (554) Elspeth Smith (555) Dr Donald Winton (556) Oliver Moore (557) </p>	<p> Jennifer Reid (558) H J C Cornwell (559) Phil Dawson (560) Jane Cornwell (561) Marian Boyle (562) Walter Black (563) James & Jane Wardrop (564) Juliette Ralston (565) Ruth Alexander (566) David Fulton (567) Anne Coleman (568) Mrs E Ray (569) Bianca McAulay (570) Mrs C Hamilton (571) H Ballantyne (572) Rev Alistair Cook (573) Mary Findlay (574) Patricia & Andrew Johnstone (575) Evelyn McCall (576), E Hopkins (577) Joyce Wilcox (578) William McConnell (579) S D (580) Raymond Dalglish (581) Shona Kirby (582) John Pirie (583) Richard & June Reid (584) Robert Hamilton (585) Mr J Heriot (586) Patricia Stuart (587) P E McNally (1775) John Naughton (1790) David Kerr (1791) Alan Hutchison (1792) Ian Glen (1793) Margaret Macintyre (1794) </p>

Issue 40	Policy P7 – Green Network	
Development plan reference:	Policy P7 – Green Network	Reporter: Philip Hutchinson
Body or person(s) submitting a representation raising the issue (including reference number):		
Andrew Forrest Properties (85) Railway Paths Limited (91) RSPB Scotland (183)	Scottish Natural Heritage (226) Sport Scotland (379)	
Provision of the development plan to which the issue relates:	Policy P7 – Green Network which supports and promotes development that safeguards existing green networks and/or has the potential to contribute to an integrated green network.	
Planning authority's summary of the representation(s):		
<p>Support Policy P7</p> <p><u>Andrew Forrest Properties (85)</u></p> <p>Agree that the green networks within Renfrewshire should be preserved and enhanced, as they contribute to the sense of place and character of the area, as well as increasing opportunities for outdoor recreation.</p> <p>Also support the promotion of and enhancement of green networks in forthcoming developments, particularly where they have potential to increase sustainable journeys.</p> <p>Recognise that the green network throughout Renfrewshire is important in encouraging sustainable methods of travel for short journeys to reach amenities such as schools, health centres and for local shopping.</p> <p><u>Railway Paths Limited (91)</u></p> <p>Policy P7 is supported.</p> <p>The safety and viability of routes could be strengthened by seeking both active frontages and connection points where development proposals adjoin existing or planned routes.</p> <p><u>RSPB (183)</u></p> <p>Welcome the identification of the Green Network opportunities.</p> <p>Wish to see additional connectivity from Lochwinnoch up to Clyde Muirshiel Regional Park, recognising the hydrological and habitat links created by the Calder Water and the access and green infrastructure links from RSPB Scotland's Lochwinnoch Reserve and Nature Centre to the Regional Park.</p>		

Object Policy P7

Scottish Natural Heritage (226)

Welcome the inclusion and prominence given to the green network within the Local Development Plan strategy and policies.

However, consider that the current Policy P7 - Green Network does not give clear guidance to developers on their role in delivering the green network.

Sport Scotland (379)

It is crucial to appreciate and make explicit reference to the role of the green network in providing for sport and recreation. The SPP (CD/03), PAN 65 (CD/57) and the NPF2 (CD/19) are all clear on the integral role of the green network in providing for sport and recreation.

Modifications sought by those submitting representations:

P7 (a) Any development sites adjoining the green network will be expected to show how the development will functionally connect to and visually address the green network." (91)

Add an additional route to the Green Network diagram from Lochwinnoch up to Clyde Muirshiel Regional Park (183)

Policy P7 is amended to read. "The council will support development which promotes and safeguards existing green networks. Development should seek to enhance the green network by ensuring that on site green infrastructure is incorporated and designed to be integral to the overall development and will link into and enhance the wider green network". Also recommend that the Policy includes the appropriate hook and reference point to the New Development SG (CD/09) and suggest "development will be required to comply with the criteria set out in the New Development SG" (226)

Green Network text should be revised accordingly in line with the SPP (CD/03), PAN 65 (CD/57) and the NPF2 (CD/19) which are clear on the integral role of the green network in providing for sport and recreation. (379)

Summary of responses (including reasons) by planning authority:

Support for the Policy (85, 91, 183)

Support for the policy on green network is noted and supported

General (91, 226 and 379)

Policy P7 is set within the policy framework provided by National Planning Framework 2 (NPF2) (CD/19), the Scottish Planning Policy (CD/03), and Planning Advice Note 65 (CD/57). Policy P7 is a general policy that supports and promotes development which safeguards existing green networks and/ or has the potential to contribute to an integrated green network.

We would request that the Reporter notes that in the New Development Supplementary

<p>Guidance it is proposed to strengthen the text to pay particular reference to the role of the green network in providing for sport and recreation. As well as add a bullet point 3 in the SG (CD/09) green network criteria already states that ‘access is provided to the green network from the new development’ and it is felt that this addresses the issues raised by Railway Paths Ltd (91). It is also proposed to add a bullet point will be added to the SG in line with SNH’s (226) comments that ‘Development should seek to enhance the green network by ensuring that on site green infrastructure is incorporated and designed to be integral to the overall development and will link into and enhance the wider green network.</p>
<p><u>RSPB (183)</u></p> <p>Prior to the publication of the Main Issues Report, a study was undertaken by the Glasgow Clyde Valley Green Network Partnership which identified the Strategic Habitat Priorities (CD/58) indicating the locations where there are significant opportunities for wider network enhancement. It is these locations that are illustrated on Figure 15 and at this stage it is therefore not seen as a specific priority to add an additional route to the green network diagram from Lochwinnoch up to Clyde Muirshiel Regional Park. The council will however continue to seek opportunities to enhance and expand the green network throughout Renfrewshire and exclusion of the route suggested by the respondent from Figure 15 will not impact adversely on the potential green network opportunities between Lochwinnoch up and Clyde Muirshiel Regional Park. Figure 15 will remain as set out in the proposed LDP.</p>
<p>Reporter’s conclusions:</p> <ol style="list-style-type: none"> 1. Policy P7 is not inconsistent with NPF2, SPP or PAN 65. It occupies the same policy framework, as explained in the first paragraph of the authority’s response above. It will effectively be strengthened and its aims will be reinforced by the New Development Supplementary Guidance – as expanded in the ways set out above. 2. Figure 15 follows from the study undertaken by the Glasgow Clyde Valley Green Network Partnership. I consider it unnecessary to vary Figure 15 by inserting an additional link into the network between Lochwinnoch and Clyde Muirshiel Regional Park. This corridor is in any case already identified as a SINC on the Proposals Map. Leaving the policy as it presently stands should have no adverse consequences in practice.
<p>Reporter’s recommendations:</p> <p>No modifications</p>

Issue 41	Policy P8 – Open Space	
Development plan reference:	Policy P8 – Open Space	Reporter: Philip Hutchinson
Body or person(s) submitting a representation raising the issue (including reference number):		
Ranfurly Castle Golf Club (16) Pamela Sloan (2063)		
Provision of the development plan to which the issue relates:	Policy P8 – Open Space protects open space, recreational provision and amenity space from development unless it is demonstrated that its loss or replacement with alternative provision of quality and quantity which is in a suitable accessible location, is acceptable and in accordance with the criteria set out in the New Development Supplementary Guidance.	
Planning authority's summary of the representation(s):		
<p><u>Ranfurly Castle Golf Club (16)</u></p> <p>The wording of Policy P8 – Open Space is overly restrictive and should support appropriate development of small areas within a large area of open space where it is demonstrated that such development would secure the future and improve the offer of the remaining larger area of open space. It is considered that such support would have numerous benefits, which are not currently clearly encouraged.</p> <p><u>Pamela Sloan (2063)</u></p> <p>Rather than the council providing a 'sense of place' concrete jungles are being created with a distinct lack of good quality green/open spaces, and in particular natural habitats, for the community to enjoy.</p> <p>The criteria for house builders to provide green areas within residential developments has meant inadequate green areas have been provided, which is completely ineffective and now the council wish to remove existing natural habitats and replace them with more concrete.</p> <p>Renfrewshire council's aspirations for development seems to be at odds with their vision of creating open/ green spaces and protecting existing green spaces, woodland and natural habitats.</p> <p>Overall the plan seems contradictory in places viz a viz developments versus retention and provision of open/ green spaces and local habitats creating a sense of place.</p>		
Modifications sought by those submitting representations:		
Policy P8 should be amended to: 'the development of limited parts of large areas of open space shall be permitted where it can be demonstrated that such proposals shall support or bring positive benefits to that wider area of open space, in terms of its offer and value to the wider community, or where there are no unacceptable negative impacts'. (16)		

<p>No modifications suggested (2063)</p>
<p>Summary of responses (including reasons) by planning authority:</p>
<p><u>Ranfurly Castle Golf Club (16)</u></p> <p>The intention of Policy P8 is to support, protect and enhance existing open space as well as ensuring appropriate provision of open space in new developments. The wording in the policy is in accordance with Scottish Planning Policy (CD/03).</p> <p>In relation to permitting development within open space, we disagree that the policy is overly restrictive. It does not imply no development. Should development be required then the policy aims to ensure there should be no net detriment to those who use the open space or to the surrounding environment.</p> <p>Applications for development would be assessed through the policies in the Local Development Plan and the criteria set out in the New Development Supplementary Guidance (SG) (CD/09). Both the proposed Local Development Plan (LDP) and New Development SG allow a reasonable amount of flexibility to ensure that protection on development will provide maximum benefit for the place it is located or the people who use it.</p> <p><u>Pamela Sloan (2063)</u></p> <p>The Spatial Strategy in the proposed LDP focuses on creating successful places, consolidating and concentrating development in existing built up areas as well as aiming to ensure the protection and enhancement of the environment and natural assets within places.</p> <p>A range of policies in the proposed LDP aim to create ‘a sense of place’ with good quality green networks and open spaces including Policy P1, P7, P8, ENV 1, ENV 2, ENV 3 and ENV 4 as well as the associated criteria set out in the New Development Supplementary Guidance (CD/09). In trying to create successful places, the proposed Local Development Plan also encourages development and regeneration with green networks, open space and amenity space are integral to the design and layout of development. Therefore we would disagree that the proposed LDP is contradictory in places, as it aims to balance all interests and land uses.</p> <p>The proposed LDP is designed to be read as a whole document with more than one policy dictating built form. This policy framework provides the council with the ability to protect and create good quality green and open spaces. No change to the policy is required.</p>
<p>Reporter’s conclusions:</p>
<ol style="list-style-type: none"> 1. I see no conflict between Policy 8 as it stands and the relevant passages of SPP (primarily its paragraphs 149 – 155). 2. The language used in Policy 8 does not prohibit the use of open space for development. It instead requires that the loss of open space, or its loss and appropriate

replacement elsewhere, is acceptable in relation to the criteria set out in the authority's New Development Supplementary Guidance.
Reporter's recommendations:
No modification

Issue 42	Policy ENV1 – Green belt	
Development plan reference:	Policy ENV1 – Green belt	Reporter: Dannie Onn
Body or person(s) submitting a representation raising the issue (including reference number):		
Persimmon Homes (West) Scotland (186) BAE Systems (2040) Consortium of CALA Homes (West), Persimmon Homes and Lynch Homes (2112) CALA Homes (West) (2114)		
Provision of the development plan to which the issue relates:	Outlines the role and purpose of the green belt in Renfrewshire and details in what circumstances development within the green belt would be acceptable.	
Planning authority's summary of the representation(s):		
<u>Persimmon Homes (West) Scotland (186), Consortium of CALA Homes (West), Persimmon Homes and Lynch Homes (Consortium) (2112) and CALA Homes (West) (2114)</u> <p>This issue addresses concerns raised in the above representations about Policy ENV1 and the green belt boundary in general. Specific proposed changes to the green belt boundary, raised by these representations are addressed under Issues 25, 26, 27, 28. The proposal for a new ‘settlement boundary’ policy is addressed under Issue 45.</p> <p>Renfrewshire council’s planning policy framework does not incorporate a ‘countryside’ designation and therefore, the green belt boundary across its council area abuts tightly against its settlement edge. The green belt boundary needs modification if new sites on settlement edges are required for development.</p> <p>The way the green belt boundary has been used in the proposed Local Development Plan means that it effectively also functions as the settlement boundary. By undertaking a comprehensive green belt review of all green belt boundaries in Renfrewshire, it would be possible to define a boundary which was not in all locations tight against the settlement edge in accordance with Scottish Planning Policy (CD/03) (paragraph 162). This would enable any greenfield ‘white land’, outwith the green belt, to be brought forward for development where there was a shortfall in the supply of effective land.</p> <p>Geddes Consulting has undertaken a number of green belt reviews for specific sites within Renfrewshire, on behalf of a number of clients. This review has established that the council’s <i>strategic green belt review</i> (Background Paper 4) (CD/49) has been undertaken at a broad scale and has limited application when considered at the site specific level.</p> <p><u>BAE Systems (2040)</u></p> <p>Concern is raised about the restrictive approach taken to redefining the green belt</p>		

boundary around Dargavel Village. No justification is given for the proposed change to the green belt in this area which now closely follows the edge of the development area defined in the masterplanning exercise for the site. It is considered that defining the green belt boundary in this way has three key weaknesses: the Environmental Test Facility, which is a significant business, is proposed to be included within the green belt; the green belt boundary does not follow any identifiable features on the ground; and there needs to be flexibility at the edge of the 'expanded' settlement of Bishopton.

It is proposed that the green belt boundary should be revised to address these by following the Dargavel Burn. This would: help in shaping the planned development in the Bishopton Community Growth Area; protect the setting of Bishopton at a boundary that is not too restrictive; protect access to open space at the edge of the urban area; and not threaten the coalescence of settlements.

Modifications sought by those submitting representations:

The inner boundary of the green belt should be modified as shown on the appended drawings:

- 11016-009-A Green Belt Review
- 11017/010/A Green Belt Review
- 12003-016 Green Belt Review
- 13001-MP-P006 Green Belt Review
- 0101/+Houston-MP-001 Green Belt Review

Further modifications other than those shown may be required to take account of other representations to the proposed Local Development Plan and the need to release further land to meet the housing shortfall identified. (186, 2112 and 2114)

Proposed alteration to Map C: Erskine, Inchinnan, Bishopton. For the reasons outlined in our representations, the green belt boundary in the vicinity of Dargavel Village should be aligned along Dargavel Burn to the west and the railway to the east. The boundary should be as shown on the attached plan.(2040)

Summary of responses (including reasons) by planning authority:

Persimmon Homes (West) Scotland (186), CALA Homes (West), Persimmon Homes and Lynch Homes) (2112) and CALA Homes (West) (2114)

In the preparation of the Main Issues Report (MIR) a detailed green belt monitoring exercise was carried out. To ensure that the boundary set out in the proposed Local Development Plan (LDP) meets the requirements as set in Scottish Planning Policy (SPP)(CD/03). A detailed examination of the green belt boundary (CD/49) using the council's Geographical Information System (GIS) which provides electronic mapping and aerial photography was undertaken to identify any potential anomalies in the green belt boundary. The identified sites were subject to detailed examination including site visits to determine the most appropriate boundary. At this stage it was expected that some green belt sites would be required to meet the overall housing requirement. Therefore, in addition to the green belt review the Site Assessments (CD/06) were undertaken examining in detail, sites that may be considered for release for alternative land uses. As well as this a Landscape Assessment (CD/08) was undertaken for all sites submitted prior to the MIR, assessing the potential impacts they may have on the setting and character of the green belt and settlements. Based on this all proposed sites have been assessed for their suitability for inclusion or removal from the green belt. In this way the green belt

boundary has been modified so that new sites on the edge of settlements can be brought forward.

In accordance with Scottish Planning Policy (SPP) (CD/03), the reason why the green belt encircles the settlements within Renfrewshire is to provide clarity of that which is to be achieved in local development plans. The proposed LDP strategy is to focus on regeneration and consolidation of existing settlements, therefore the green belt is particularly important to the proposed LDP in directing development to the right locations to achieve the overall objectives.

It is agreed that the green belt boundary also effectively serves as the settlement boundary. Allocation of greenfield “white land” at the edge of settlements is however rejected. As detailed above, areas where this boundary incorporates sites outwith the built edge of the settlement in the green belt, have been identified. The ‘white land’ allocation under Policy P1 serves to ensure that development in these areas would make a positive contribution and have no significant impact on the place. The areas outwith the previous settlement edge which have been identified were considered to be able to do so and have thus been subject to a positive allocation. Identifying additional less preferential sites to be brought forward based on a potential shortfall in the supply of effective land, would immediately place these areas under pressure for development, rather than reserving them for any supposed future need furthermore doing so could compromise the delivery of the sites which have been approved and are preferred.

In conclusion, it is rejected that any further modification of the green belt policy boundary is required and modification of the green belt policy so as to include greenfield “white land” allocations at the edge of settlements is rejected.

BAE Systems (2040)

The 2006 Renfrewshire Local Plan (CD/14) identifies the Bishopton Community Growth Area as able to contribute to the requirement for development land post 2006. Within the 2006 Plan the Royal Ordnance Factory (ROF) site was identified under Policy SS2, and thereby to be subject to a masterplan process. It was stated within the 2006 plan that “pending the outcome of the masterplanning exercise, the site would remain covered by a policy reflecting its previous use.” There were objections to the 2006 plan suggesting that the whole site should be identified as greenfield, with the developable area to be removed from the greenfield designation at a later date. The developable area was expected to be identified as part of a masterplanning process which had commenced at that time, and which has now been completed. Although the reporter (CD/16) to the 2006 plan found some merit in the objectors’ proposal to identify the whole area as greenfield immediately, the council’s approach of allowing proposals to come forward before designating the remaining area as greenbelt was considered to be sufficiently sound and was therefore upheld.

The change to the green belt at this location has therefore been brought about as a result of this earlier ambition. The masterplan process for the whole ROF site has now been undertaken and agreed with specific development proposals identified. The remaining areas within the wider ROF site, while continuing to be identified as a community growth area, have been designated as green belt to reflect the fact that there are no current proposals beyond those identified in the masterplan. Should subsequently proposals be brought forward which merit further green belt release in this community growth area, revision of green belt will be required in subsequent LDPs. It is not however considered

appropriate to continue to retain the whole area outwith the green belt until such a time as further proposals are forthcoming.

Although the revision now places the Environmental Test Facility (ETF) into the green belt, it is disagreed that this will now be constrained by green belt restrictions. New development within the green belt is considered appropriate in principle where it is for the purposes of established business as set out on page 36 of the New Development Supplementary Guidance (CD/09).

The green belt boundary precisely follows the agreed masterplan area. This is delineated on the ground by an existing path which is proposed, in the masterplan, to be upgraded and strengthened as a boundary with structural planting.

It is agreed that the green belt boundary is drawn tightly at the edge of the proposed Dargavel Village, however for the reasons stated above it is not considered appropriate to remove further areas from the green belt without specific proposals being brought forward. Proposals in this area will however be supported under Policy P5 - Community Growth Areas, where they support the principles set out in the approved masterplan.

East Bank, Langbank (2067)

The site forms part of a defined settlement boundary to the east of Langbank. The grounds of the former Eastbank House, provide an attractive landscape setting at the edge of the village and are of a high visual quality. There may be a very limited opportunity for development within the site on the footprint of the existing building and outhouses. Development on this footprint which is appropriately designed; fits well in the surrounding landscape; and contributes to the place would be considered through the submission of a planning application. The protection afforded by the green belt policy ENV1 is such that the important landscape characteristics of the site continue to be protected; it is rejected that this amounts to “overburdening blanket protection”. Removal of this site from the green belt is undesirable because of the important landscape feature and strong settlement boundary that the site provides. For the above reasons it is not considered appropriate to remove the green belt protection from this site.

Reporter's conclusions:

1. Most of the countryside in Renfrewshire is designated as green belt. Scottish planning Policy (SPP) describes the purpose of green belt designation in Scotland, which 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
- protect and give access to open space within and around towns and cities.

SPP adds that for towns and cities with a distinct character and identity that could be harmed by unplanned growth, the use of green belt designation and relevant policies may help to manage that growth more effectively. It also says that where it is considered necessary, the proposed release of land previously designated as green belt should be identified as part of the settlement strategy set out in the development plan. It is clear to me that national policy no longer intends that green belts should be a durable and permanent limit to urban expansion. They should, nevertheless, protect towns and cities from unplanned development in support of the purposes set out above.

<p>2. The Glasgow and Clyde Valley Structure Plan (the SDP) expects the green belt to continue to be designated and says that review of its inner and outer boundaries should be priorities for local development plans so as to ensure that key environmental objectives are met. It says also that the green belt is an important strategic tool in terms of the focus on sustainability and low carbon development.</p> <p>3. With the guidance of these documents in mind, I consider that the green belt in Renfrewshire should not be released lightly, where it continues to serve an important spatial and environmental function and, in particular, because the proposed plan's focus is on the re-use of brownfield land in the urban areas.</p> <p>4. At paragraph 162, SPP includes that green belt boundaries identified in local development plans should reflect the long term settlement strategy and ensure that settlements are able to accommodate planned growth; that inner boundaries should not be drawn too tightly around the urban edge, but where appropriate should create an area suitable for planned development between the existing settlement edge and green belt boundary; and that boundaries should also take into account the need for development in smaller settlements within the green belt, and where appropriate leave room for expansion. However, to remove further land from the green belt now could place undue pressure for development in those areas, in the expectation that greenfield land will be released. That could reduce investment in brownfield regeneration, weaken the setting and identity of Glasgow, Paisley and Renfrew and reduce access to open space around those towns. The purposes of green belt designation would then be harmed. For this reason and in this case, I consider that there is no need to provide an area suitable for future planned development between the existing settlement edge and the green belt boundary.</p> <p>5. Representations relating to East Bank at Langbank are dealt with at issues 16 and 33.</p>
<p>Reporter's recommendations:</p>
<p>No modification</p>

Issue 43	Policy ENV2 - Natural Heritage	
Development plan reference:	Policy ENV2 - Natural Heritage	Reporter: Karen Heywood
Body or person(s) submitting a representation raising the issue (including reference number):		
Royal Society for Protection of Birds (RSPB) Scotland (183) Strathclyde Geoconservation Group (202)		
Provision of the development plan to which the issue relates:	Outlines the approach taken to protecting sites designated for their natural heritage interest.	
Planning authority's summary of the representation(s):		
<u>RSPB Scotland (183)</u> The principle of the policy is supported, although alternative wording is suggested to clarify the position on developments which do not meet the stated criteria. <u>Strathclyde Geoconservation Group (202)</u> Objection to reference not being made to geodiversity in the plan. A statement which includes designating nature conservation sites for their geological importance as well as that of plants and animals would be welcomed. The group would be pleased to suggest geodiversity sites.		
Modifications sought by those submitting representations:		
Suggest the Policy be re-worded so that it says 'To accord with the Local Development Plan, developments must not have an adverse effect.....'(183) Suggest additional wording to the policy such as "... to protect and enhance..... and the wider biodiversity with the underlying geodiversity -- etc" (202)		
Summary of responses (including reasons) by planning authority:		
<u>RSPB Scotland (183)</u> The RSPB's suggestion for the inclusion of text within Policy ENV2 is accepted as it would provide more focus on development not having an adverse effect on natural heritage. If the reporter is minded, Policy ENV2 will be altered to reflect the RSPB submission. <u>Strathclyde Geoconservation Group (202)</u> The Clochodrick Stone, Site of Special Scientific Interest (SSSI), is currently the only site		

within Renfrewshire which has been designated for its geological interest. This interest is protected within the plan under the Policy ENV2, although it is agreed that the specific detail referring to geological interest as a part of natural heritage has not been stated. Although the Clochodrick Stone has been designated nationally, there are no sites of geological interest in Renfrewshire which have been designated locally. No sites have been put forward to be considered for adoption in this Local Development Plan. It is not appropriate to have a policy which would introduce new designations outwith the Local Development Plan process although it is agreed that the policy should be amended to be clear that natural heritage designations can include geological interests.

Modifications (183 and 202)

To take into the account both suggestions from the respondents and if the reporter was so minded, the following policy wording could replace the existing wording of policy ENV2 in the proposed Local Development Plan: "To accord with the Local Development Plan, developments must not have an adverse effect on the integrity of sites protected for their natural conservation interest, which have the potential to protect and enhance designation sites and the wider biodiversity and geodiversity of the area, and where appropriate, will seek to improve these resources..."

Reporter's conclusions:

RSPB Scotland

1. The council accepts the RSPB's suggestion for the inclusion of text within Policy ENV2, as it would provide more focus on development not having an adverse effect on natural heritage. I see no reason to disagree.

Strathclyde Geoconservation Group

2. The council agrees that Policy ENV2 should be amended to be clear that natural heritage designations can include geological interests. I see no reason to disagree. I have also suggested consequent grammatical alterations to the policy.

3. The Clochodrick Stone has been designated nationally and no sites of local geological interest have been put forward for consideration in the proposed plan. I agree with the council that it is not appropriate to have a policy which would introduce new designations outwith the local development plan process and no alteration should be made to the policy in this regard.

Reporter's recommendations:

1. The first sentence of policy ENV2 – Natural heritage should be replaced with the following sentence:

To accord with the local development plan, developments must not have an adverse effect on the integrity of sites protected for their natural conservation interest or which have the potential to protect and enhance designation sites and the wider biodiversity and geodiversity of the area. Where appropriate, the council will seek to improve these resources.

Issue 44	Policy ENV4 - The Water Environment	
Development plan reference:	None	Reporter: Karen Heywood
Body or person(s) submitting a representation raising the issue (including reference number):		
Scottish Environmental Protection Agency (SEPA) (2108)		
Provision of the development plan to which the issue relates:	Outlines the approach taken to the protection and enhancement of the water environment as well as the control and management of water.	
Planning authority's summary of the representation(s):		
<p><u>SEPA (2108)</u></p> <p>Object to the proposed Local Development Plan as the Policy ENV4 does not refer to the Water Framework Directive (WFD) (CD/59) or provide a link to the detailed information provided in the New Development Supplementary Guidance (CD/09).</p>		
Modifications sought by those submitting representations:		
<p>An alteration to strengthen the policy and allow us to remove our objection could be achieved by including the following 2 sets of wording in the policy.</p> <p>In line with the objectives of the Water Framework Directive (CD/59), the River Basin Management Plan (RBMP) (CD/60) the Clyde Area Management Plan (CD/61), there will be support for proposals... (2108)</p> <p>Add to policy "Supplementary Guidance provides additional information with respect to:</p> <p>Adequate Drainage Infrastructure SUDS Culverting Sewerage Provision Reduction in Environmental Impact of Development Protection and Improvement to Renfrewshire's Water Environment RBMP Objectives Site design (2108)</p>		
Summary of responses (including reasons) by planning authority:		
<p><u>SEPA (2108)</u></p> <p>Although there is specific reference within the text of the proposed LDP that the aim of Policy ENV4 is to meet the objectives of the Water Framework Directive (CD/59), as well as contributing to river basin management planning and in particular the Clyde Area Management Plan (CD/61), it is considered that making particular reference to the Water Framework Directive (CD/59), River Basin Management Plan (CD/60) and the Clyde Area</p>		

<p>Management Plan (CD/61) would highlight the important link between River Basin Planning and Land Use planning regimes. It is also agreed that the policy should explicitly make reference to the more detailed guidance being provided within the New Development Supplementary Guidance (CD/09).</p> <p>If the reporter was so minded Policy ENV4 could be altered to read the following: 'In line with the Water Framework Directive, River Basin Management Plan and the Clyde Area Management Plan, there will be support for proposals which encourage protection of the existing water environment as well as improvement to the control and management of water along with the enhancement of biodiversity, flora and fauna surrounding blue corridors. The inclusion of green infrastructure which promotes the integration of blue and green networks in and around developments will be encouraged to ensure that the water environment is central to the fabric of places, contributing to sustainable flood management and not having an adverse effect on the integrity of any Natura 2000 sites. Proposals for development will require to be assessed against the criteria set out in the New Development SG.'</p>
<p>Reporter's conclusions:</p> <p><u>SEPA</u></p> <p>1. The council agrees to SEPA's suggestions that Policy ENV4 should refer to the Water Framework Directive, the River Basin Management Plan and the Clyde Area Management Plan, as the additions would highlight the important link between river basin planning and land use planning regimes. The policy should also refer to the more detailed guidance in the New Development Supplementary Guidance. I see no reason to disagree.</p>
<p>Reporter's recommendations:</p> <p>1. Alter Policy ENV4 so that it reads as follows:</p> <p>In line with the Water Framework Directive, River Basin Management Plan and the Clyde Area Management Plan, there will be support for proposals which encourage protection of the existing water environment as well as improvement to the control and management of water along with the enhancement of biodiversity, flora and fauna surrounding blue corridors. The inclusion of green infrastructure which promotes the integration of blue and green networks in and around developments will be encouraged to ensure that the water environment is central to the fabric of places, contributing to sustainable flood management and not having an adverse effect on the integrity of any Natura 2000 sites. Proposals for development will require to be assessed against the criteria set out in the New Development Supplementary Guidance.</p>

Issue 45	Additional Policy	
Development plan reference:	None	Reporter: Dannie Onn
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Ranfurly Castle Golf Club (16) Persimmon Homes (West) Scotland (186) The Coal Authority (188) Elderslie Community Council (2059) SEPA (2108) Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112) CALA Homes (West) (2114)</p>		
Provision of the development plan to which the issue relates:	No provision in the proposed LDP	
Planning authority's summary of the representation(s):		
<p><u>Persimmon Homes (West) Scotland (186), Consortium of CALA Homes (West), Persimmon Homes, Lynch Homes (2112), CALA Homes (West) (2114)</u></p> <p>A new 'settlement boundary' policy (or similar) would ensure that there are areas identified as suitable for planned growth outwith the restrictive policy framework applied to the green belt.</p> <p>A 'countryside designation' could also be used to protect areas of land between the settlement boundary and the green belt where an appropriate green belt boundary cannot be identified against the settlement edge. These approaches would require the introduction of appropriately worded policies.</p> <p><u>The Coal Authority (188)</u></p> <p>Whilst minerals is referred to in the proposed LDP, there is no corresponding policy content and no mention of the issue of land instability that will arise from mining legacy in Renfrewshire. The Coal Authority consider the proposed LDP to be deficient in that it fails to set out the necessary policy framework that Scottish Planning Policy (SPP) (CD/03) requires.</p> <p><u>SEPA (2108)</u></p> <p>Object to the proposed Local Development Plan as there is no specific policy to address air quality issues which requires that an air quality assessment is undertaken for all proposed developments within and any significant developments nearby the council's current Air Quality Management Areas. This policy should address the effects of individual and cumulative developments on air quality.</p>		

Ranfurly Castle Golf Club (16)

Failure to address Listed Building maintenance and restoration in the plan. A new policy is suggested.

Elderslie Community Council (2059)

Request that the council revisit the proposed LDP by identifying Elderslie village centre as an area where area-specific, positive planning policies and actions are required to stimulate appropriate investment and ensure that existing and proposed vacant sites are quickly brought back into use. This should also be extended to each of the three or four derelict sites adjacent to the village centre, where there should also be a formalisation of the ad-hoc enforcement policy of removing advertisement hoardings from derelict sites - so depriving owners of income from keeping their sites derelict, and instead stimulating development.

Modifications sought by those submitting representations:

Include a new 'settlement boundary' policy (or similar) at the following settlements: Erskine (two locations), Bridge of Weir, Bishopton and Houston. (186, 2112, 2114)

Include a 'countryside designation' to protect areas of land between the settlement boundary and the green belt where an appropriate green belt boundary cannot be identified against the settlement edge. (186, 2112, 2114)

Include a policy on minerals to enable the issue to be considered at an early stage in the development process; ensuring that developers take account of the risks associated with unstable land as part of development proposals in the interests of public health and safety. (188)

Include a specific policy (linking to the New Development Supplementary Guidance) to address air quality issues. (2108)

A new policy is suggested to cover Listed Building Maintenance & Restoration which should read:

To facilitate the maintenance and restoration of a listed building of quality and value, limited new build enabling development shall accord with the Local Development Plan subject to the below listed criteria:

- (a) the submission of a detailed business plan for the overall development showing how funds raised from the sale of the enabling development are to be channelled into the conservation of the building to which the development relates to secure its ongoing use;
- (b) the proposed restoration has the support of Historic Scotland;
- (c) the new build element does not result in the division and fragmentation of the building from its grounds in terms of the management of the area;
- (d) the applicant can demonstrate that sufficient financial assistance is not available from any other source;
- (e) the extent of any new build is restricted to the minimum necessary to facilitate the restoration and reuse of the listed building and any other related activities agreed via the business plan;
- (f) the enabling development is located and designed to have minimum impact on the listed building; and
- (g) the design of the enabling development is of a high standard. Where that

development is clearly associated to the listed building it should reflect and complements the style and design of the listed building. Any permitted enabling development, where considered necessary, shall be subject to an appropriate Section 75 Legal Agreements regarding matters such as: the allocation of funds, phasing of construction or other design and layout matters. (16)

No suggestions provided. (2059)

Summary of responses (including reasons) by planning authority:

Settlement Boundary (186, 2112, 2114)

The Renfrewshire Proposed LDP aims to provide a clear policy and guidance framework to direct development and growth to the most appropriate areas and the council consider that it is very clear from the proposals maps where the identified strategic and local areas of growth are to be targeted. The inclusion of an additional settlement policy, would result in an unnecessary policy layer circling settlements, adding a degree of confusion. The Scottish Planning Policy (SPP) (CD/03) (paragraph 159) advises that “green belt designation should be used to direct development to suitable locations, not to prevent development from happening”. It is considered that Policy ENV1 within the proposed LDP provides sufficient flexibility to allow development where appropriate in green belt locations and the New Development SG (CD/09) provides adequate detailed criteria to ensure development is delivered to the appropriate standards for that site or area. Therefore the proposed LDP has identified areas for planned growth outside Renfrewshire settlement and village envelopes, as outlined in Policy P3 and P6, and we consider that the policy framework in the plan is not overly restrictive to prevent development in appropriate locations. Therefore do not consider that this additional policy is required.

Countryside Policy (186, 2112, 2114)

As highlighted above, the proposed LDP provides an appropriate green belt policy and very clear green belt boundary, the inclusion of a ‘countryside policy designation’ would result in a duplication and confusion. It is considered that the green belt policy provides a clear context for decision making as required by SPP (CD/03) (para. 160). Therefore, the inclusion of a ‘countryside policy designation’ is unnecessary.

Minerals (188)

The requirement for a specific policy within the proposed LDP was examined, with these details set out in LDP Background Paper 5 – Minerals (CD/62). In partnership with the Glasgow and the Clyde Valley Strategic Development Plan Authority and neighbouring authorities, the availability, quality, accessibility and requirement for mineral resources across the Glasgow and the Clyde Valley area was assessed and Renfrewshire was ruled out as a search area for minerals as there were other more appropriate areas within this current plan period that could meet the local demand. It was therefore considered that there was no specific requirement to have a policy with the proposed LDP and it was best to address minerals in detail through the New Development SG (CD/09). In relation to the specific points raised, agreement has been reached between the Council and the Coal Authority to provide additional text and detail to the Mineral Section within the New Development SG (CD/09). Given this positive outcome there is no need to alter the plan.

Air Quality (2108)

In reviewing the proposed LDP and accompanying New Development SG (CD/09) we would agree with SEPA that although there is guidance in relation to air quality and advice on the submission of air quality assessment there is no reference to air quality or a hook in the LDP to lead to the guidance and advice in the New Development SG (CD/09). The council has worked with SEPA and it has been agreed that an additional policy within the Environment Section of the LDP with a change the format, location and form of the criteria for air quality within the New Development SG (CD/09) would be a positive addition to the plan. In particular a new policy would aim to protect air quality in general but also the advice in the New Development SG (CD/09) would provide a particular reference to air quality management areas. If the Reporter is so minded an additional policy in the Environment section of the LDP could be added to ensure consideration of air quality. The policy could read as follows:

POLICY ENV 5: 'The council will seek to ensure that development proposals shall not individually or cumulatively have an adverse affect on air quality. Where required, planning applications should be accompanied by an air quality assessment which demonstrates the likely impact on air quality and how such impacts will be mitigated. All development proposals will require to be in accordance with the provisions set out in the New Development SG.'

Listed Building Maintenance & Restoration (16)

The requirement for a specific policy on listed building maintenance and restoration is rejected given that through consultation with Historic Scotland this was not something that was considered necessary for the proposed LDP. The policy framework provided by POLICY ENV3 – Built Heritage and the criteria set out in the New Development SG (CD/09) provides sufficient detail in relation to listed buildings and their settings.

Elderslie Village Centre (2059)

The text within the proposed LDP indicates that although some village centres are not included in the network of centres, their role and function is recognised as being important for villages. These centres are considered to contribute to the place and that is the reason for the Policy P1 zoning for centres such as Elderslie. In particular it is recognised that there is a need for positive enhancement of the range of facilities / services as well as the physical fabric and public realm of Elderslie centre. It is considered that the most appropriate way forward for implementing and delivering this objective is not to identify each individual centre within the development plan proposals maps but to take a proactive approach and identify an individual action or actions with the LDP Action Programme (CD/01) to develop in partnership with the community and others, a range of initiatives which will help to promote development and enhancement of each town and village centre. If the Reporter is so minded to agree that the following additional action is added to the LDP Action Programme (CD/01) and that the LDP remains unchanged in this respect.

Delivering the Centres Strategy:

Ref No.	LDP Action	Policy / Proposal	Lead / Partners	Time-scales	Funding Details / Risk	Progress
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28	To undertake centre health checks for Strategic Centres, Core Town Centres and Local Service Centres including Elderslie Centre and to develop centre strategies where appropriate to deliver improvements within centres	C1, C2, P1	RC Planning & Economic Development	2014 - 2016	Not required		
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Reporter's conclusions:
Green Belt, settlement boundary and countryside designation

1. I have set out my conclusions on the green belt under issue 42. These include that the clear green belt boundaries effectively define the settlement limits, directing development to the most appropriate areas. I agree with the council that a settlement boundary and countryside designation for land between the settlement and the green belt would be an unnecessary duplication.

Minerals policy

2. The proposed plan makes no reference to minerals. Renfrewshire has not been identified as an area of search for minerals by the Strategic Development Plan authority. Regulation 27 of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008 says that supplementary guidance adopted in connection with a particular local development plan may only deal with the provision of further information or detail in respect of the policies or proposals set out in that plan and then only provided that those are matters which are expressly identified in a statement contained in the plan as matters which are to be dealt with in supplementary guidance. Thus it would not be competent to include a detailed minerals policy in the supplementary guidance adopted in connection with the proposed plan. However, it would be within the scope of the advice in Circular 06/2013 to provide information on the risk of unstable land in relation to other policies covering proposed developments. That would address the concerns of the Coal Authority. I therefore find that no modification to the proposed plan is needed.

Air quality

3. This is not specifically referred to in the proposed plan, although it is mentioned in the council's draft supplementary guidance. I agree with the council that a suitable hook is required in the proposed plan so that air quality can be addressed in general terms, such

that the detailed application of the policy in relation to air quality management areas can be set out in supplementary guidance. A new policy is needed.

Listed building repair and maintenance through enabling development

4. Policy ENV3 of the proposed plan sets out the requirement that built heritage be safeguarded, conserved and enhanced where appropriate. The proposed policy includes support for the retention, sympathetic restoration, appropriate maintenance and sensitive management of listed buildings. This policy does not deal with enabling development. The text at page 32 of the proposed plan includes that restoration and re-use of Renfrewshire's historic assets plays an important role in the regeneration of places and centres and then refers to the difficulties in securing significant investment and new uses. It refers to the action programme, but in terms of listed buildings this appears to be limited to Paisley town centre in particular and promotion of the issues more generally. Given the difficulties associated with the desirable aim of preserving and re-using the listed buildings, it seems to me that a policy approach to enabling development would benefit the proposed plan. Of course, that does not imply that the Ranfurly Castle golf clubhouse or any other listed building would necessarily be a suitable case. That would be a matter for the planning authority in due course.

5. The suggested new policy includes most of the criteria necessary for the use of enabling development to secure the future of listed buildings which are beyond economic repair, although the wording might need to be strengthened to ensure that there is a genuine need; that the building would be rescued without harm to its setting; and that the harm of allowing development other than in accordance with the development plan is outweighed by the benefit to the listed building. However, the detailed guidance and further information would sit most appropriately in the council's supplementary guidance. For that to take effect there would need to be a hook in the plan itself. I consider that this would be best achieved by modifying the operative sentence of Policy ENV3 of the proposed plan.

Elderslie village centre

6. Elderslie is not specifically included in the proposed plan as part of the network of centres across Renfrewshire. However, its designation under policy P1 recognises the need for new development to respect the existing built form and uses. The planning authority acknowledges the need for positive enhancement of the village centre and proposes an additional action for the LDP Action Programme. As the Action Programme is not being examined here, it is a matter for the planning authority to make such a change, subject to the requirements of the regulations. I do not consider that improvements to Elderslie require a specific reference in the proposed plan, which should provide a spatial strategy in a concise map-based document rather than detailed development or regeneration projects. No modification is needed here.

Reporter's recommendations:

1. Include a new policy in the environment section worded as follows:

"POLICY ENV5 – Air Quality

The council will seek to ensure that development proposals shall not individually or cumulatively have an adverse affect on air quality. Where required, planning

applications should be accompanied by an air quality assessment which demonstrates the likely impact on air quality and how such impacts will be mitigated. All development proposals will require to be in accordance with the provisions set out in the New Development SG.”

2. Add two sentences to the text on page 32, at the end of the second paragraph under the heading Built Heritage, to read:

“The use of enabling development will be considered where it is essential to the preservation of built heritage and where the benefits outweigh any conflict with other parts of the development plan. The New Development SG sets out the criteria to be met by enabling development.”

3. Modify the second sentence of Policy ENV3 to read:

“Development proposals, including enabling development, within or in the vicinity of built heritage assets will be required to demonstrate that there is no negative impact to their site or setting and that they are in accordance with the provisions set out in the New Development SG.”

Issue 46	Miscellaneous	
Development plan reference:	None	Reporter: Karen Heywood
Body or person(s) submitting a representation raising the issue (including reference number):		
Glasgow Airport Limited (2064) Scottish Natural Heritage (SNH) (226) Norman Urquhart (2035)		
Provision of the development plan to which the issue relates:	Miscellaneous changes or additions suggested to the Local Development Plan	
Planning authority's summary of the representation(s):		
<p><u>Glasgow Airport Limited (2064)</u></p> <p>The respondent made several comments on minor word changes or small amendments to figures in the proposed Local Development Plan (LDP).</p> <p>In relation to the LDP Proposal Maps, Circular 8/2002 (CD/63) provides guidance on the administration of Public Safety Zones around airports, including the responsibilities of Local Planning Authorities. Policy 23 in particular states that: "Local plans should include a policy stating that Public Safety Zones have been established for a particular airport...". This should be added to the proposals maps.</p> <p>Page 14, Policy E5 requires to be altered, to include "adverse" between "significant" and impact" in final sentence to read: "Any development proposals in or around the airport should not have a significant adverse impact on the infrastructure of the airport or surrounding environment and demonstrate that it does not have an adverse effect on the integrity of any Natura 2000 sites."</p> <p>Page 24, Policy I6 also requires to be altered to insert "and efficient" in bullet 4 to read: "The safe and efficient use of the airport, flight activity, navigation, flight paths and Ministry of Defence surveillance system".</p> <p><u>SNH (226)</u></p> <p>Recommend that a definition is added in the glossary for habitat networks which will help give understanding to the users of the plan. Also recommend that you include the boundary of the Clyde Muirshiel Regional Park on the proposal map so that developers and development management staff know when they need to meet the criteria which is set out in the New Development Supplementary Guidance (CD/09).</p> <p><u>Norman Urquhart (2035)</u></p> <p>Object to the Plan on the basis that the proposed green belt boundary does not, as it</p>		

should do, follow any clearly identifiable feature on the ground. The green belt boundary on the Proposals Map for Inchinnan runs arbitrarily through the site of the former Greenhead Nursery. The consequence of this is that part of the former nursery site will be able to be re-developed, and part will remain undeveloped. The part that will remain undeveloped will not be available for public access, and does not contribute in any way to the character of the area or the openness of the green belt. The entirety of the former Greenhead Nursery site at Inchinnan site is strongly considered to be an appropriate 'brownfield' site, to which new development should be directed.

Modifications sought by those submitting representations:

The 'British Airports Authority' has not existed since 1986. All references to 'BAA' in the proposed Local Development Plan, SPG and supporting documents should be changed to 'Glasgow Airport' or 'Glasgow Airport Limited'. (2064)

To aid consistency and understanding and avoid confusion with historic initiatives, the council should consider referring to the airport Strategic Economic Investment Location (SEIL) or 'Glasgow Airport Zone' as the 'Glasgow Airport Investment Zone'. (2064)

Page 7, Figure 7 – Glasgow Airport Zone. Change the 'Glasgow Airport Zone' boundary to align with the 'Airport – Town Centre Corridor' and, in particular, ensure that Paisley Gilmour Street Station is incorporated into the 'Glasgow Airport Zone' boundary. Also change the area marked orange 'Future Airport Expansion' to the south and west of '4 – New river crossing to link Westway to Abbotsinch Road' to yellow 'Ancillary Airport Uses' which reflects existing use as a long stay car park. Remove "taxiway" from "6 – Realigned Abbotsinch Road to accommodate airfield taxiway development" to read "6 – Realigned Abbotsinch Road to accommodate airfield development". Incorporate aprons around terminal building into blue 'airfield' designation as these areas are part of the airfield. Also consider improving terminal building outline as current version is inaccurate. Consider including St James' Interchange, Abbotsinch Road/Greenock Road junction and M8/Sanderling Road as 'Key Gateways'. (2064)

Add the following definition to the Glossary: "A habitat network is a set of separate areas of habitat which are sufficiently connected for a particular species to move between the individual areas". The boundary of the Clyde Muirshiel Regional Park is added onto the relevant proposal map. (226)

Amend the green belt boundary, as shown on the Proposals Map extract, in order to exclude all of the former Greenhead Nursery (Inchinnan) site (outlined in red) from the Greenbelt designation. (2035)

Summary of responses (including reasons) by planning authority:

Glasgow Airport (2064)

The council accepts the suggested minor amendments to the proposed LDP text changing BAA to Glasgow Airport as well as changing 'Glasgow Airport Zone' to 'Glasgow Airport Investment Zone'. All of the minor amendment to the Figure 7 are also good suggestions and the council accept that these will be positive additions to Figure 7 within the proposed LDP. If the Reporter was so minded, the suggested text changes to the plan and additions to Figure 7 should be undertaken.

In relation to the proposed change to Policy E5 – Glasgow Airport Operational Land, we agree to the addition of the word ‘adverse’ for clarity in the policy. If the Reporter was so minded, Policy E5 would be altered to read:

‘The Council promotes the area around Glasgow Airport as a key location which will support economic growth and the requirements of the airport. Within the operational land and land surrounding the airport there will be a presumption in favour of uses associated with the operational functions of the airport, or uses which are compatible and do not compromise the airport functionality; this includes land required to improve surface access arrangements, including sustainable transport and travel. Enhance connectivity to and from the airport requires the support of a number of stakeholders and the Council will continue to work in partnership to ensure enhanced connections in and around the airport. Any development proposals in or around the airport should not have a significant adverse impact on the infrastructure of the airport or surrounding environment and demonstrate that it does not have an adverse effect on the integrity of any Natura 2000 sites.’

With regards to the proposed change to Policy I6 – Renewable and Low Carbon Energy Developments, we agree with the respondent that an additional word in relation to the airport will provide clarity. If the Reporter was so minded, Policy I6 would be altered to read:

- *The safe and efficient use of the airport, flight activity, navigation, flight paths and Ministry of Defence surveillance system.*

SNH (226)

The addition to the Glossary is a positive addition to the proposed LDP. If the Reporter was so minded, the council will amend the Glossary to include the following definition:

"A habitat network is a set of separate areas of habitat which are sufficiently connected for a particular species to move between the individual areas".

It is also agreed that indicating the boundary of Clyde Muirshiel Regional Park is a positive addition to the Proposals Maps and if the Reporter was so minded this boundary could be added to provide clarity.

Norman Urquhart (2035)

It is agreed that this minor amendment to the plan as suggested by the respondent, to include the entire former nursery site within Policy P1 zoning, taking it out of green belt zoning, is appropriate. The entire site is a previously developed site and in accordance with the proposed LDP Spatial Strategy, small green belt anomalies are to be altered to reflect the fact that the green belt zoning is no longer applicable. In this case half the former nursery site is zoned as green belt and half is within the built up urban area zoned as Policy P1. If the Reporter was so minded, this small green belt anomaly could be altered to reflect that this is a previously developed site and is considered part of the built up area of Inchinnan.

Reporter's conclusions:
<p><u>Glasgow Airport</u></p> <p>1. The council accepts the suggested minor amendments to the text of the proposed plan and the additions to Figure 7. Although the concern expressed about Public Safety Zones has not been followed up in the council's Summary of Response above, the council has discussed this issue with Glasgow Airport. The council proposes to show the Public Safety Zones for the airport on the relevant proposals maps. The council does not propose to include a specific policy in the proposed plan to cover this issue, as this is a matter of detail than would best sit with the detail in the supplementary guidance. An additional statement will be inserted into the New Development Supplementary Guidance as follows:</p> <p style="padding-left: 40px;">“The council will deal with development proposals within the Glasgow Airport Public Safety Zone in accordance with stated government policy contained in the Scottish Executive Circular 8/2002.”</p> <p>2. Glasgow Airport is satisfied that the council's approach with regard to the Public Safety Zones adequately covers the requirements of Circular 8/2002. I agree.</p> <p><u>SNH</u></p> <p>3. The council accepts the suggested addition to the Glossary.</p> <p><u>Norman Urquhart</u></p> <p>4. The council agrees that suggested minor amendment to the plan to include the entire former Greenhead nursery site within Policy P1 and removing it from the green belt is appropriate.</p> <p>5. I see no reason to disagree with all of these changes to the proposed plan.</p>
Reporter's recommendations:
<p>1. All references to 'BAA' in the proposed plan should be changed to 'Glasgow Airport' or 'Glasgow Airport Limited'.</p> <p>2. The airport 'Strategic Economic Investment Location' or 'Glasgow Airport Zone' should be referred to as the 'Glasgow Airport Investment Zone'.</p> <p>3. On page 7, Figure 7 make the following changes:</p> <ul style="list-style-type: none"> (i) change the 'Glasgow Airport Zone' boundary to align with the 'Airport – Town Centre Corridor'; (ii) ensure that Paisley Gilmour Street Station is incorporated into the 'Glasgow Airport Zone' boundary; (iii) change the area marked orange 'Future Airport Expansion' to the south and west of '4 – New river crossing to link Westway to Abbotsinch Road' to yellow 'Ancillary Airport Uses' to reflects existing use as a long stay car park; (iv) remove 'taxiway' from '6 – Realigned Abbotsinch Road to accommodate airfield taxiway development' to read '6 – Realigned Abbotsinch Road to

accommodate airfield development’;

(v) incorporate aprons around terminal building into blue ‘airfield’ designation as these areas are part of the airfield;

(vi) correct inaccuracies in terminal building outline; and

(vii) include St James’ Interchange, Abbotsinch Road/Greenock Road junction and M8/Sanderling Road as ‘Key Gateways’.

4. The Glasgow Airport Public Safety Zones should be added to the proposals maps.

5. The final sentence of Policy E5 should be altered to read:

Any development proposals in or around the airport should not have a significant adverse impact on the infrastructure of the airport or surrounding environment and demonstrate that it does not have an adverse effect on the integrity of any Natura 2000 sites.

6. The fourth bullet point of Policy I6 should be altered to read:

- The safe and efficient use of the airport, flight activity, navigation, flight paths and Ministry of Defence surveillance system.

7. The following definition should be included in the Glossary:

A habitat network is a set of separate areas of habitat which are sufficiently connected for a particular species to move between the individual area.

8. The boundary of Clyde Muirshiel Regional Park should be added to the proposals maps.

9. On the proposals maps, the entire site of the former Greenhead Nursery, Inchinnan should be included within the policy P1 area and removed from the greenbelt.