

RENFREWSHIRE COUNCIL

Application No: 16/0291/PP

DEVELOPMENT AND HOUSING SERVICES
RECOMMENDATION ON PLANNING APPLICATION

Regd: 21/04/2016

Applicant

Agent

Gladman Developments Ltd.
2 Eliburn Office Park
Eliburn
Livingston
EH54 6GR

Nature of proposals:

Erection of residential development including formation of vehicular access, open space and landscaping, provision of Sustainable Urban Drainage (SUDs) and associated engineering works (Planning Permission in Principle)

Site:

Land to North East of Strathgryffe Crescent, Gryffe Castle, Bridge of Weir

Application for:

Planning Permission in Principle

Introduction

This application was the subject of a Pre-Determination Hearing in line with the requirements set out in Section 38A of the Planning etc. (Scotland) Act 2006 and the related Development Management Regulations.

Section 14(2) of the Planning etc (Scotland) Act 2006 requires that where an application has been subject of a Pre Determination Hearing under Section 38A, then the application must thereafter be referred to the Full Council for determination.

The Pre Determination Hearing took place at the Planning and Property Policy Board on 23 August 2016 and the issues raised at the hearing mirror those raised through written objections to the application.

The issues raised at the Pre Determination Hearing and through objection have been summarised in this report under the section 'Objections/Representations' and have been fully considered in the assessment of the application.

Description

Planning permission (in principle) is sought for residential development on an area of agricultural land located within the greenbelt to the north west of Bridge of Weir. The application site extends to approximately 4.4 hectares on the north side of Kilmacolm Road. The site is bounded to the east and south east by mature woodland, subject of a Tree Preservation Order, beyond which sits Gryffe Castle, a Category B listed building formerly used as a children's home and converted to private residential use in 2002. Kilmacolm Road defines the southern and western boundaries of the site adjacent to existing residential development at Strathgryffe Crescent. The northern edge of the site is currently undefined. The applicant indicates that one vehicular access to the site will be taken from Kilmacolm Road.

Although the application is in principle an indicative layout has been submitted illustrating a development of approximately 80 dwellings with a mix of detached, semi detached and terraced houses.

History

16/0012/EO - Request for a screening opinion as to the requirement for an Environmental Impact Assessment for residential development. Environmental Impact Assessment not required 10/03/2016.

15/0787/NO - Proposal of Application Notice for the erection of residential development. Accepted November 2015.

Policy & Material Considerations

Scottish Planning Policy

Scottish Planning Policy highlights the primacy of the Development Plan. The extant Development Plan is the Glasgow and the Clyde Valley Strategic Development Plan 2012, Clydeplan's Strategic Development Plan Proposed Plan (2016) and the Adopted Renfrewshire Local Development Plan 2014 as detailed below with relevant policies identified.

Glasgow and the Clyde Valley Strategic Development Plan 2012

Strategy Support Measure 1: Delivering the Spatial Development Priorities
 Strategy Support Measure 8: Green Infrastructure: An Economic Necessity
 Strategy Support Measure 10: Housing Development and Local Flexibility
 Diagram 3: Spatial Development Strategy and Indicative Compatible Development
 Diagram 4: Sustainable location assessment

Clydeplan's - Strategic Development Plan Proposed Plan (2016)

The Proposed SDP is a material consideration as it is the settled view of the Clydeplan Authority.

Policy 1: Placemaking
 Policy 7: Joint Action Towards the Delivery of New Homes
 Policy 8: Housing Land Requirement
 Policy 14: Green Belt
 Policy 16: Managing Flood Risk and Drainage
 Policy 18: Strategic Walking and Cycling Network
 Table 1: Placemaking Principles
 Schedule 14: Strategic Scales of Development
 Diagram 11: Assessment of Development Proposals

Adopted Renfrewshire Local Development Plan 2014

Policy ENV1: Green Belt
 Policy ENV2: Natural Heritage
 Policy ENV 3: Built Heritage
 Policy P2: Housing Land Supply
 Policy I5: Flooding and Drainage

New Development Supplementary Guidance

Delivering the Environment Strategy: Green Belt; Housing in the Green Belt; Contaminated Land ; Natural Heritage; Trees, Woodland and Forestry; Listed Buildings; Noise;
 Contaminated Land
 Delivering the Places Strategy: Places Development Criteria
 Delivering the Infrastructure Strategy: Flooding and Drainage and Infrastructure Development Criteria

Material considerations

Renfrewshire's Housing Land Supply Supplementary Guidance 2015 requires to be considered in addressing the Council's shortfall in housing land supply. The replacement Renfrewshire Local Development Plan will set out a framework for new and appropriate housing sites for meeting housing need and demand in Renfrewshire.

Planning legislation requires that planning decisions are made in accordance with the Development Plan unless material considerations indicate otherwise. In this case the proposal requires to be considered against the policies and guidance set out above, the supporting information submitted, the comments of the consultees, any objections received and any other relevant material considerations.

Publicity

Neighbour notification has been undertaken in accordance with statute. The application was also advertised in the Paisley and Renfrewshire Gazette on 27th April 2016, with a deadline for representations to be received by 18th May 2016.

Objections/Representations

There has been 135 letters of objection and 1 letter of support submitted in relation to this application. The issues raised can be summarised as follows:

1. The spatial policy of the Clyde Valley Plan considers that sites for development should follow the sequential approach of firstly brownfield; brownfield within green belt and finally green belt. The proposal contravenes this strategic policy as it is green belt land.
2. Development of this site ignores the Renfrewshire Local Development Plan and is an expansion into the green belt contrary to Policy ENV1.
3. The application fails to reflect and adopt the main considerations and requirements of the Renfrewshire Local Development Plan, Housing Land Supply Supplementary Guidance 2015 and the various incorporated documents, guidance and policies.
4. The application does not undertake a sequential test of sites within Bridge of Weir but promotes a case that there is a shortfall of housing within the 5 year effective supply. The proposal would not only permanently remove a significant green belt area in an important location, but would make it difficult to halt other such opportunistic proposals.
5. There is land available within the confines of the village that is ripe for development on a smaller scale such as the site at Bulls Garage which is already becoming an eyesore.
6. There are other brownfield sites which adjoin the settlement boundary of Bridge of Weir and are sustainable in terms of location and proximity to different transport modes.
7. The essential character of the village would be severely eroded by such large scale development in a wholly inappropriate setting, in the green belt and adjacent to an important listed building.
8. The site is not contained in landscape and visual terms with a minimum landscape boundary proposed of 7.5 to 10 metres in width.
9. The proposed development breaks the long standing western edge of the village and the tree belt proposed for the western boundary does not provide a robust and defensible boundary. There is therefore nothing physical to mark the extent of western expansion.
10. Bridge of Weir as a village has the important characteristic of separation from other surrounding villages. If the application was approved it would decrease the area of open countryside between Bridge of Weir, Quarriers Village and Kilmacolm.
11. The application site is rolling countryside and clearly visible from public roads, clearly separated from the settlement area by the policies and gardens of Gryffe Castle, a category 'B' listed building.
12. The wooded grounds of Gryffe Castle are one of only two remaining extensive areas of

mature, deciduous and mixed woodland in the village. This amenity is used by local residents and visitors. The proposed development would negatively alter the landscape character of this valuable asset.

13. The areas health care facilities, services and infrastructure would be unable to cope with the demands of further residential development. Further expansion will result in a negative impact on Bridge of Weir's village structure and community.

14. Primary and High Schools within the catchment are at or very close to capacity, in part due to high numbers of placement pupils.

15. There are already two new housing developments in the Bridge of Weir area; Shillingworth and Weirs Wynd and these will put further pressure on the local schools where some classes are already large.

16. The roads through Bridge of Weir would be unable to accommodate the increase in traffic from the development.

17. The volume of traffic at the times of the "school runs" will be increased causing unnecessary delays for people travelling to work.

18. Kilmacolm Road is a fast, busy road which has already had traffic calming measures applied. At peak times the traffic is frequently queued back beyond the edge of the village. The village is at saturation point for parking.

19. When added to the developments at Brookfield and Shillingworth, the volume of traffic will cause even more problems at Spurryhillock Roundabout and on the entry slip roads to the A737. The traffic lights at the slip roads cannot accommodate the level of traffic at the moment.

20. Public transport is poor so would result in a minimum of 80 more cars additional to the 42 (minimum) from Shillingworth and 200 at the old Merchiston site using the local road network.

21. It is currently difficult to enter and leave the Gryffe Castle driveway at peak times due to high volumes of traffic. The proposed development would make the situation much worse as it would add volume and another bottleneck.

22. No direct pedestrian access is proposed from the development to the village amenities, including the school.

23. No safe route to the schools exists for children from the proposed development without impacting on the property rights of other users and in particular the residents of Gryffe Castle, where a proposed access route is planned.

24. Approximately 45 healthy and mature trees covered by a Tree Preservation Order (TPO) would have to be felled to accommodate any pavement and the boundary wall of Gryffe Castle would require to be moved back from the road and the requisite permission of owners would be required.

25. The types of homes proposed and approved in the vicinity are not in accordance with the affordable homes the government seeks.

26. This development poses a threat to many different animal species due to loss of habitat and foraging grounds. There are regular sightings of bats, owls, birds of prey, a multitude of bird species, foxes, deer and the common lizard.

Consultations

The Director of Community Resources (Roads) – Has raised a number of concerns which require to be addressed and additionally recommends a suite of conditions to deal with detailed matters.

The Director of Community Resources (Design Services) – The Drainage Impact Assessment (DIA) is considered to be acceptable for a planning application in principle and should form the basis of any related DIA for a detailed application.

The Director of Community Resources (Environmental Services) – States that a number of conditions will be required in relation to site investigation, remediation strategy and/or method statement and verification reports and subject to compliance with the mitigation measures detailed within the report titled 'Enviro Centre, Kilmacolm Road, Bridge of Weir, Noise Impact Assessment Report', dated March 2016.

The Director of Education and Leisure – States that any development at this site would impact on the accommodation and provision of curricular and social spaces within Bridge of Weir Primary School and Gryffe High School. The proposed development would, if approved, result in an increase in pupil roll beyond operational capacity to the detriment of education provision.

West of Scotland Water – No response.

Strathclyde Partnership for Transport - Request the provision of a footway and bus shelter on the north side of Bridge of Weir Road.

Bridge of Weir Community Council – Object to the proposal on the basis of location within the green belt contrary to the LDP, that a defensible green belt boundary exists and development of this site would set a precedent for further residential development along Kilmacolm Road, inadequate service provision and impact on local road network/traffic and pedestrian safety.

Kilbarchan Community Council – Object to the proposal on the basis of its impact on the surrounding road network.

Summary of Main Issues

Environmental Statement - A request for a screening opinion determined that although the proposal would fall within Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011, it was not considered likely that the proposed works would have a significant environmental impact which would require an Environmental Impact Assessment be undertaken on the basis of no significant long term impacts on the environment having had regard to the characteristics of the development, the location of the development, and the characteristics of the potential impact.

Appropriate Assessment – N/A

Design & Access Statement - The applicant states that the application proposal creates a logical extension to the existing settlement form and reflects its position on the periphery of the settlement edge by introducing a robust defensible green belt boundary by introducing new mixed species structure planting along the northern edge of the site. This, it is submitted, supplements green infrastructure with internal landscaping to soften the built form. It is submitted that the proposal will have no direct affect on Gryffe Castle and its setting by setting development back from the northern and eastern sectors of the site to mitigate against any filtered views through the trees from Gryffe Castle's south facing facade and its access road. It is further stated that development of the site would comprise a mix of detached, semi-detached and terraced houses similar to densities of surrounding

development.

Other Assessments

Pre-Application Consultation Report - Outlines the process which has been undertaken and confirms that pre-application consultation, set out by statute, including a public exhibition, was satisfied. It states that approximately 80 members of the public visited the exhibition and 15 completed questionnaires were received. It is stated that in general terms the questionnaires raised concerns over the infrastructure impact of the proposed development, the overarching need for more housing development in Renfrewshire and the impact of the proposals on the green belt. The applicant claims that following the event, access arrangements for the site have been reviewed in particular whether the site will be accessed by a roundabout or signal controlled junction. The general feedback favoured a signal controlled junction which was seen as a positive intervention to control traffic speeds on Kilmacolm Road.

Planning Statement – The applicant states that Renfrewshire Council is failing to maintain an effective 5 year housing land supply, as required by national planning policy and therefore additional housing sites in sustainable locations that can be delivered in the short term require to be brought forward. The applicants accept that the council has been proactive in approving the Housing Land Supply Supplementary Guidance (HLSSG) as a framework to facilitate this and consider that this proposal represents an opportunity for the housing land supply issue to be positively addressed. It is submitted by the applicant that it has been demonstrated that the application complies with the HLSSG and with Scottish Planning Policy (SPP). It is submitted that it has been demonstrated that the benefits of approving the proposal, in terms of augmenting the housing land supply, and supporting the economy are neither significantly nor demonstrably outweighed by any adverse impacts.

Soil and Agriculture Report – It is stated that the site is currently primarily utilised as grassland, defined as category 4, type 4.1 in the Land Classification for Agriculture which is non prime and supports a narrow range of crops. It is recommended in the report that any topsoil from the site should be reused on the site, or utilised for the continual improvement of soil resources in neighbouring localities.

Utilities Report – It is reported that there is existing 11kV infrastructure, low pressure gas mains, water mains and telecoms infrastructure within close proximity of the site boundary and proposed new site entry. It is stated that there is a potential requirement for the protection or diversion of localised infrastructure but required works are expected to be minor. It is claimed that initial investigations have illustrated that the site is deliverable from a utilities perspective and solutions necessary to support the water supply will be progressed as part of the detailed design.

Archaeology Report – The report states that based on the results of assessments, there is a low potential for the discovery of buried archaeological remains within the proposed development site. It is submitted that there would be no significant effect upon the setting of Gryffe Castle, which is set within its own grounds and enclosed by mature woodland.

Economic Effects – The applicants claim that the proposed development will have a number of positive economic effects, including supporting a number of construction, retail and public service jobs as well as providing increased expenditure into the local Renfrewshire economy.

Extended Phase 1 Habitat Survey - The applicants recommendations are that any development of the site is preceded by a suite of activity surveys in order to determine use of the site by foraging and commuting bats. It is recommended that the site is enhanced for foraging and commuting bats by retaining as much of the existing hedgerow as is practical and by incorporating additional native hedge, tree and shrub planting into landscaping proposals. It is suggested that a bat sensitive lighting scheme should be designed to ensure

that habitats are maintained as dark corridors and buildings are enhanced for roosting bats by the addition of bat boxes or bat tubes.

With regard to badgers, the applicant recommends that precautionary measures are used during any proposed construction activity and that any excavations are covered during the hours of darkness. It is recommended that any works affecting potential bird nesting habitat should be carried out outside the breeding season and that additional native hedge, tree and shrub planting be incorporated into the landscaping proposals. With regard to invertebrates and other species, it is recommended that an Ecological Clerk of Works is present prior to any planned vegetation clearance to check the area for hedgehogs and moles and that native trees and shrubs are planted within the development to mitigate for any potential loss of such habitat.

Landscape and Visual Appraisal –

Affects on the landscape: The applicants assessment concludes that in terms of landscape resources within the site, minor adverse effects are anticipated as a result of the removal of part of the mixed species hedgerow and complete removal of the existing pastoral grassland and that once the new structural planting is established, a minor beneficial effect is predicted. It is stated that the Clyde Basin Farmlands regional character area, within which the site is located, will be largely unaffected by the proposed development with minor adverse effects predicted through the construction and operational stages of development. It is also considered that the Rugged Upland Farmland type will also be largely unaffected, and whilst there will be moderate adverse effects during the construction stage, the effects will reduce to minor adverse once the development is completed.

Affects on visual amenity: The applicants assessment states that the landscape effects will be localised and contained within the site boundary, with only minimal indirect effects on the wider landscape setting in the long term. Once the new structure planting is established, a minor beneficial effect is predicted as the new tree belt along the northern boundary establishes a link to the existing woodland areas to the east and west. It is stated that Gryffe Castle and its grounds will not be affected by the proposed development as the application site lies wholly within the agricultural lands located to the west of the listed building group and its setting. It is submitted by the applicant that the Clyde Basin Farmlands regional character area within which the site is located, will be largely unaffected by the proposed development with minor adverse effects predicted through the construction and operational stages of development. It is claimed that the Rugged Upland Farmland landscape type will also be largely unaffected, and whilst there will be moderate adverse effects during the construction stage, the effects will reduce to minor once the development is completed. In terms of visual assessment, it is claimed that the development will be visible from select locations to the south and west, with views from the north and east largely obscured by intervening features such as vegetation, localised landforms and buildings. The report concludes that once complete, the new development will complement existing housing.

Air Quality Assessment - The applicants submit that the primary long-term concern in relation to air quality is the emissions generated by traffic and the subsequent impact on the local ambient air quality at residential and public areas located within the vicinity of the main road network. The two main pollutant concentrations of concern from this source are nitrogen dioxide and particulate matter. It is submitted that the air quality assessment predicts no significant change in nitrogen dioxide and particulate concentrations at all locations on the comparison of the 'with and without' development scenarios. The magnitude of impact for both pollutants is considered to be negligible.

Drainage Strategy Plan and Flood Risk Assessment – The applicants submit that the development can be drained in accordance with the recommendations of the latest planning guidance and design criteria. It is stated that the foul water from the development is to be discharged to the existing, publicly owned, combined sewerage network and that the surface water drainage from the site will incorporate full SUDs measures to control the discharge

from the site and reduce the pressure on the existing drainage system. It is claimed that in the main this will be achieved using detention basins and filter trenches; surface water will discharge, either to the combined sewerage network or to the natural watercourses to the west of the site. It is concluded that the Type 1 Flood Assessment presented above confirms that the site is at low risk of flooding from tidal, fluvial, groundwater and pluvial sources.

Preliminary Environmental Assessment Report – The applicants report recommends that sufficient gas monitoring installations are included in the site investigation specification to suitably assess the potential for ground gas generation within the in situ soils. It is submitted that with the exception of the southern boundary adjacent to Kilmacolm Road, the site is not indicated to lie within a flood risk area. The report states that the site lies out with a Radon affected area and no Radon gas protective measures are necessary within the site area and that a review of BGS Geology and Coal Authority Reports indicate that the site can be considered stable.

Noise Assessment – The applicants report states that due to the proximity of the A761 Kilmacolm Road, there is potential for noise from road traffic to impact on future residents. The assessment concludes that sufficient mitigation measures, including acoustic fencing and window design, could be incorporated into the detailed design to ensure that both the external and internal living areas can be reduced to levels appropriate for future residents.

Traffic Statement – The applicants state that the site will be accessed by a new signalised junction, which will be constructed at the existing priority junction between A761 Kilmacolm Road and Strathgryffe Crescent. It is further stated that a junction assessment has been completed for the proposed site access junction and for the A761/B790 signalised junction within Bridge of Weir. It is claimed that the results show that development traffic can be accommodated at these locations. The report concludes that accessibility from the development to local services is good in terms of walking and cycling, with the village centre being less than 1km distant. It is stated that a network of paths is proposed to provide good connectivity within the development and that pedestrians will be provided with a signalised crossing across the A761 to link into the footway on the southern side. The report concludes that the scale of development proposed is not anticipated to have a detrimental impact on the local network.

Planning Obligation Summary – N/A

Scottish Ministers Direction – N/A

Assessment

Section 25 of the Town and Country Planning (Scotland) Act 1997, requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case, the Development Plan comprises the Approved Glasgow and Clyde Valley Strategic Development Plan (GCVSDP) 2012 and the Adopted Renfrewshire Local Development Plan 2014 and associated New Development Supplementary Guidance, including the Housing Land Supply Supplementary Guidance. The proposal also requires to be assessed taking account of the Scottish Planning Policy and Clydeplan's Strategic Development Plan Proposed Plan 2016. In addition, the comments of consultees and the issues raised through representations are material considerations in the assessment of the application.

Scottish Planning Policy

Scottish Planning Policy (SPP) sets out national planning policies which reflect Scottish Ministers' priorities for the operation of the planning system and for the development and use of land. SPP aims to support sustainable development and the creation of high quality places. It sets out two overarching policy principles namely a presumption in favour of development that contributes to sustainable development; and, placemaking which seeks the creation of high quality places. It considers that the planning system should support

economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place. It is not to allow development at any cost.

The presumption in favour of sustainable development does not change the statutory status of the development plan for decision making. For proposals that do not accord with development plans, the primacy of the plan is maintained. The presumption in favour of development that contributes to sustainable development is a material consideration. The proposal subject of this application comprises a significant housing development on green belt land with no defensible green belt boundary. There is limited services and facilities to serve this new development along with a lack of necessary infrastructure to successfully deliver homes at this location. Therefore it is considered that the proposed development is not sustainable, nor will it enhance the existing village of Bridge of Weir.

In relation to Placemaking, it is difficult to see how this development will complement the local features such as landscape, topography and skylines when development of this site will have an adverse impact on these features.

SPP indicates that planning the right development in the right place requires the promotion of sustainable patterns of development appropriate to the area. The location chosen for this development does not optimise the use of existing resource capacities. There are resource capacity constraints at this site. It is located adjacent to the existing settlement, however it is difficult to see how this particular site would have the most benefit for the amenity of local people or the vitality of the local economy.

On Enabling the Delivery of New Homes SPP indicates the planning system should identify a generous supply of land within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5 year supply of effective housing land at all times; enable provision of a range of attractive, well-designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places.

In this regard the LDP identified land across the Renfrewshire area to meet the housing land requirements with the focus on brownfield land to meet the majority of the housing land requirements along with a number of green belt release sites to help stimulate supply in the short term. However, following the examination of Renfrewshire's Local Development Plan, the Reporter concluded that there was a potential shortfall in housing land in Renfrewshire and that the LDP did not identify sufficient land to meet the housing need and demand. In response, three additional green belt housing sites, identified by the Reporter, were released to address the potential shortfall in housing land supply. Furthermore, the Housing Land Supply Supplementary Guidance 2015 (HLSSG) was produced in order to provide a framework to assess sites which could come forward in the short term to contribute to the housing land supply. The application site under consideration is not one of those sites identified by the Reporter for release and neither does it meet all of the requirements set out in the HLSSG.

Glasgow and the Clyde Valley Strategic Development Plan 2012

The Approved Glasgow and the Clyde Valley Strategic Development Plan 2012 provides the framework for local authority development management decisions and outlines a Spatial Vision for the city-region to 2035 along with a Spatial Development Strategy (SDS) to deliver that vision. The Approved SDP establishes the principle of development where development proposals conform to its policy direction and provisions. Strategy Support Measure 1 'Delivering the Spatial Development Priorities states that the Spatial Development Strategy is clear and consistent in its intent, to support sustainable economic growth and development.

The Fundamental Principles of the Strategic Development Plan include the acceptance that development and investment proposals whose location and development compatibility

accords with the Spatial Development Strategy and its related frameworks, will be deemed to support the Spatial Vision and Strategy. Diagram 3 sets out the range and type of development which the Authority would expect as part of the Spatial Development Strategy and with regard to Green Belt indicative forms of development considered to be in line with the strategy include: green infrastructure; woodland creation; sustainable access and natural leisure facilities; biodiversity and biomass planting. This proposal for a significant residential development within the green belt is therefore not a development considered to conform to the Spatial Development Strategy.

It further considers that new strategic development proposals which do not reflect the Spatial Development Strategy and its related frameworks are deemed not supportive of the Spatial Vision and Strategy. Where this is the case, it states that proposals will require to be assessed upon their own merits by the relevant local authority adopting the sustainable location assessment set out in Diagram 4. When the proposal is assessed against Diagram 4, the following conclusions can be made:

Climate Change - Minimising the Development footprint of the city-region/minimising the carbon footprint of the city- region/mitigating greenhouse gas emissions - The development of the site subject of this application, due to its size, and location in the green belt will not contribute toward the aims of minimising the development footprint or carbon footprint of the city-region or mitigating greenhouse gas emissions. Notwithstanding this, Renfrewshire Council accepts that additional sites are required to facilitate the development of new homes to meet identified need and that there may be a requirement for development of green belt land, however, the application proposal, due to its size and location is not considered to be a sustainable development.

Low Carbon Economy - Supporting sustainable economic competitiveness/supporting key economic sectors and new environmental technology sectors/supporting the farming and rural economy - Although it is widely accepted that the housebuilding industry makes a significant contribution to the Scottish economy, this is not dependant on the development of the application site. The application site, although identified as Class 4.1 (non-prime) under the McCauley Land Capability for Agriculture classification, is defined as being land capable of producing crops and could be utilised for farming purposes. Therefore the development of this site would neither support sustainable economic competitiveness, new environmental technology sectors nor farming and the rural economy.

Sustainable Transport - Supporting sustainable access and active travel/providing appropriate public transport access/supporting future public transport services - The application was accompanied by a Transport Assessment which demonstrates that the development of the site could be accommodated within the existing road network. The Director of Community Resources has not objected to the proposal in this regard subject to conditions to ensure that appropriate pedestrian linkages to existing facilities and the transport network can be achieved.

Green Network - Developing green infrastructure/supporting green belt objectives/supporting biodiversity networks and designations - Paragraph 4.48 of the Approved SDP and Strategy Support Measure 8 'Green Infrastructure: an economic necessity' establishes that the green belt is central to the sustainable planning of the city-region, that it is an important strategic tool and has a significant role to play in achieving key environmental objectives by directing planned growth to the most appropriate locations, supporting regeneration, creating and safeguarding identity through place-setting and protecting the separation between communities. Although the application site is located on the edge of Bridge of Weir in proximity to some areas of existing housing, it comprises a large natural agricultural site in a prominent green belt location, which adds to the local landscape character and setting of Bridge of Weir. Additionally it has no obvious spatial connection to the village and no defensible green belt boundary, whereas the existing boundary formed by the TPO protected woodlands of Gryffe Castle provides a more robust settlement edge. The

application site is not considered to be an infill site as it is located to the west of this wooded area, which already acts as a defensible green belt boundary, and as such is set apart from the remainder of the built up area of Bridge of Weir. The development of this site does not therefore support the green belt objectives of maintaining the identity of settlements and protecting and enhancing their landscape setting.

Water Environment - *Managing flood-risk/improving and safeguarding water quality* - The Director of Community Resources is satisfied that the DIA submitted in support of the application is acceptable for a planning application in principle and to demonstrate that appropriate drainage can be achieved. The Director of Community Resources considered there to be no requirement for a Flood Risk Assessment. It is not evident that there will be an unacceptable impact on water quality.

Network of Centres - The application is for residential development and it is not therefore considered that this part of the assessment criteria is directly relevant.

Low Carbon Energy - *Developing green energy and/or energy smart-grids/contributing to a low carbon energy and technology future* - It is not evident that the proposal would contribute to developing green energy or that it would contribute to a low carbon energy and technology future.

Taking all of the above considerations together leads to the conclusion that the application site is not a sustainable location, and as such the set tests under Diagram 4 are not satisfied.

With regard to housing land supply the Approved SDP indicates that Local Development Plans should allocate sufficient land which is effective, or likely to be capable of becoming effective, so as to deliver the scale of house completions required across all tenures both in the period to 2020, and from 2020 to 2025.

It is stated in Strategy Support Measure 10 that where the supply needs to be augmented, priority should be given to bringing forward for earlier development any sites which have been allocated in the Local Development Plan for construction in the period 2020 to 2025. It continues that if further sites are needed, their identification for release should be guided by the criteria in Diagram 4 to find the most suitable locations. It considers that these sites must be absent of insurmountable infrastructure constraints and be of a scale which is capable of delivering its house completions in the next five years. Such sites should also be compatible with the vision and planning principles of both the Strategic Development Plan and the Local Development Plan. It is accepted that there remains a potential Housing Land Supply shortfall within Renfrewshire and that additional housing sites are required. However, such sites require to be in sustainable locations.

The application site has not been identified as a housing development site through the preparation and adoption of the Local Development Plan or as one of the additional housing sites identified by the Reporter following the Examination of the Local Development Plan. The application site has been assessed against the criteria of Diagram 4 but fails to satisfy the set tests. It is considered that the proposal does not contribute to sustainable development nor accord with the Vision and Spatial Development Strategy of the Approved SDP.

Proposed Strategic Development Plan 2016(SDP)

The Proposed SDP 2016 was submitted to the Scottish Ministers for Examination on 26th May 2016 and represents the settled view of Clydeplan, the Strategic Development Planning Authority of which Renfrewshire is a constituent part and therefore it has to be considered in the assessment of this proposal.

The Proposed SDP 2016 sets out a Spatial Development Strategy which supports a presumption in favour of sustainable development that contributes to economic growth. It

acknowledges the city region's legacy of development and infrastructure and recognises that maximising the benefit of those resources is fundamental to ensuring the long term success of the city region. Through Policy 1 'Placemaking', it seeks to embed the creation of high quality places firmly as part of its Vision and Spatial Strategy.

It considers that in support of the Vision and Spatial Development Strategy, new development proposals should take account of the Placemaking Principles set out in Table 1, including maintaining and enhancing landscape character and supporting the objectives of the Glasgow and Clyde Valley Green Belt. The application proposal would neither maintain nor enhance the landscape character of Bridge of Weir nor support the objectives of the Green Belt in this location and therefore does not comply with Policy 1 Placemaking.

The Proposed SDP advocates a consistent approach to the consideration of development proposals across the city region and considers that proposals which are in locations or at a scale or of a nature not identified in the SDP could undermine the Vision and Spatial Development Strategy. To assist in the development management process Section 10 of the Plan 'Implementing the Plan and Development Management' sets out 'thresholds for strategic scales of development', within Schedule 14. With regard to Greenfield Housing Schedule 14 considers that 10 or more units outwith the Community Growth Areas or sites outwith those identified in LDP's are considered to be strategic. Given that the proposal comprises a housing development where an indicative number of 80 dwellings is proposed on a site located within the Green Belt designated through the Adopted LDP, it is considered to fall within the definition of strategic scale of development.

The Proposed SDP states that Diagram 11: 'Assessment of Development Proposals' should to be used by local authorities when assessing strategic scale development proposals or other proposals that may impact on the Plan Strategy. This Diagram will determine whether strategic scale development proposals comply with the policies, schedules and diagrams of the SDP, and Box 1, sets out the considerations relevant to each development type which will ascertain whether it supports the Vision, Spatial Development Strategy and Placemaking Policy. When the proposal is assessed against the relevant policies and schedules, the following conclusions can be made.

Policy 8 'Housing Land Requirement', states that Local Authorities should make provisions in Local Development Plans for the Housing Land Requirement set out in Schedule 8 and Schedule 9, allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirements, provide for a minimum of 5 years effective land supply at all times, undertake annual monitoring of completions and through Section 10 of the Plan 'Development Management' take steps to remedy any shortfalls through the granting of planning permissions that contribute to sustainable development and accord with the Vision and Spatial Development Strategy, Local Development Plans and other local strategies. It is accepted that there is a shortage in the effective housing land supply in Renfrewshire and therefore the application proposal is being assessed against Section 10, of the Plan.

Policy 14 'Green Belt' states that in support of the Vision and Spatial Development Strategy, Local Authorities should designate within Local Development Plans, the boundaries of the Green Belts to ensure that the objectives set out in paragraph 8.15 are achieved. Paragraph 8.15 considers that the Green Belt is an important strategic tool which has a significant role to play in supporting the delivery of the Spatial Development Strategy and achieving the objectives set out below. When the potential impact of the application proposal is considered against these objectives, the following conclusions can be made:

Directing planned growth to the most appropriate locations - the application site is located within the designated Green Belt and has not been identified through the LDP as an appropriate location for planned growth.

Supporting regeneration- the application site is located within the designated Green Belt and will not therefore support the regeneration of Renfrewshire or the city-region as a whole.

Creating and safeguarding identity through place-setting and protecting the separation between communities/landscape setting and identity of settlements - the application site is a large green belt site in a prominent green belt location, which currently adds to the local landscape character and setting of Bridge of Weir. Bridge of Weir currently has a robust and defensible green belt boundary in this location in the form of a TPO protected area of woodland associated with Gryffe Castle. Development of the application site would breach this boundary and would not therefore safeguard the setting of Bridge of Weir. Additionally, as a result of the existing green belt boundary the application site has no obvious spatial connection to the village and no defensible green belt boundary, whereas the existing boundary provides a more robust settlement edge.

Protecting open space and sustainable access and opportunities for countryside recreation - the application proposal will not result in the protection of open space nor would it protect sustainable access opportunities for countryside recreation.

Maintaining the natural role on the environment - the proposal for a large housing development will not maintain the natural role of the environment in this location but will impact on the setting of Bridge of Weir and the surrounding agricultural landscape.

Supporting the farming economy of the city region - the proposal is for housing development and will not support the farming economy of the city-region.

Meeting requirements for the sustainable location of rural industries including renewable energy, mineral extraction and timber production - the application proposal does not comprise a rural industry.

The application site is designated as Green Belt within the Adopted LDP and currently performs the functions set out in paragraph 8.15 of the Proposed SDP. Development of the site for housing would undermine many of these functions including protection of the identity of Bridge of Weir, and its landscape setting and would not therefore support the delivery of the Spatial Development Strategy.

Policy 16 'Improving the Water Quality Environment and Managing Flood Risk and Drainage'. This policy seeks to support the Vision and Spatial Development Strategy and to achieve the objectives set out in paragraph 8.28 which include securing improvements to water and drainage capacity and reducing flood risk. The Director of Community Resources is satisfied that the DIA submitted in support of the application is sufficient at this stage to demonstrate that the site can be appropriately drained and is not subject to risk from flooding.

Policy 18 'Strategic Walking and Cycling Network' requires that development proposals should maintain and enhance the strategic walking and cycling network. The application proposal does not disrupt existing walking and cycling connections but does not propose any significant enhancement.

Taking all of the above considerations together leads to the conclusion that the application proposal does not meet the relevant criteria in Box 1 and is therefore regarded as a Departure from the Strategic Development Plan. To ascertain whether this Departure is acceptable, the proposal requires to be assessed against the criteria of Box 2. When the proposal is assessed against these criteria, the following conclusions can be made:

Given its location in the designated Green Belt, with no defensible green belt boundary, the proposal will not make a significant or positive contribution to sustainable development through either a modal shift or contribution to carbon reduction;

The proposal will not provide significant economic benefit which would otherwise be lost to the city region or Scotland;

The proposal would not respond to economic issues, including the protection of jobs or create a significant number of net additional permanent jobs to the city region;

There is no specific locational need for the proposal;

The proposal would not enhance nor promote natural or cultural heritage, including green infrastructure, landscape and the wider environment.

The proposal would not improve health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation.

It is not evident that the proposal would support the digital connectivity to a rural area which does not presently benefit from such connectivity.

It can be concluded therefore that the development proposal is an unacceptable departure from the Strategic Development Plan and it is therefore deemed contrary to the Proposed Strategic Development Plan 2016.

Adopted Renfrewshire Local Development Plan 2014

When the proposal is assessed against the relevant policies of the LDP and New Development Supplementary Guidance, the following conclusions can be made.

The application site is located in the green belt and is subject to assessment against Policy ENV1 'Green Belt'. Policy ENV 1 states that, amongst others, the green belt in Renfrewshire aims to identify appropriate locations to support planned growth, where required, as well as maintaining the identity of settlements and protecting and enhancing the landscape setting of an area. It states that appropriate development within the green belt will be acceptable where it can be demonstrated that it is compatible with the provisions of the New Development SG.

The New Development SG 'Delivering the Environment Strategy – Green Belt' considered that development within the green belt is appropriate in principle where it is for the purposes of or in support of a use which requires a green belt location including agriculture, forestry and recreational uses. The application proposal for residential development does not support one of these purposes and is not an acceptable form of development in the green belt.

The New Development SG 'Delivering the Environment Strategy – Housing in the Green Belt', sets out a number of criteria against which proposals for residential use in the green belt require to be assessed and considers that the majority of the criteria must be met. When the application proposal is assessed against these criteria the following conclusions can be made:

The development is required to maintain and support an established activity that is suitable in the green belt; The application proposal is not required to maintain or support an established activity that is suitable in the green belt.

It is demonstrated that there is a need for the residential use to be located out with the settlement; it has not been demonstrated that there is a need for the residential use to be located outwith a settlement.

The proposal demonstrates outstanding quality of design; The application is in principle only and it has not been demonstrated that the proposal will constitute outstanding quality of design.

The proposal integrates with, complements and enhances the established character of the area and has no significant impact on the landscape character - In this case the applicant has provided a Design and Access Statement (D&A) and Landscape and Visual Impact Assessment (LVIA) in justification of development at this location. The LVIA states that the application site is located within the 'Rugged Upland Farmlands Character Type' where development should generally be of a small scale and well sited so as to maximise the natural screening and integration provided by topographical features and that new residential development should, wherever possible, be located within existing settlements. The character assessment states that large scale development is unlikely to be appropriate. In this regard, although the application is in principle, the indicative layout for the development suggests that the site could accommodate in the region of 80 houses which is not considered to be small scale in the context of the surrounding landscape and in relation to the existing settlement of Bridge of Weir. Although the indicative layout illustrates a development set within landscaped buffers, the site is on a prominent edge of the village with little containment on its boundaries which could be identified as an appropriate and defensible edge to the green belt, whereas the Gryffe Castle woodland currently presents a robust defensible boundary. It is not considered therefore that the proposal integrates with, complements or enhances the established character of the area but would have a significant adverse impact.

The proposal is therefore considered to be contrary to the provisions of policy ENV 1.

Policy P2 'Housing Land Supply' states that the Council will maintain a 5 year supply of effective housing land at all times and prepare Supplementary Guidance including a framework to guide the release of additional housing land where a 5 year supply of effective housing land is not being maintained. It is accepted that there is a potential shortfall in the supply of effective housing land and the Housing Land Supply Supplementary Guidance was approved in 2015.

Policy P2 further states that the Council will grant planning permission in accordance with the detailed guidance provided that a number of criteria are met. When the application proposal is assessed against these criteria the following conclusions can be made.

The site is shown to be effective and can be delivered to address the identified shortfall - The applicant has submitted a representative site delivery timetable which claims that 30 units could be completed by the end of 2018, 60 units by end of 2019 and 80 units by end of 2020. This timetable would appear to be achievable and to demonstrate that the site can be delivered to address the identified potential shortfall.

It will not undermine the spatial strategy of the plan – With regard to the criteria of the Spatial Strategy, it has been demonstrated above that the proposed development will not contribute positively to the character and appearance of Bridge of Weir nor will it protect its setting or the natural environment. The proposal does not accord with the adopted LDP Spatial Strategy the focus of which is on the development of previously used sites, concentrating on existing built-up areas and key redevelopment sites, aiming to facilitate sustainable development and a low carbon economy. It is acknowledged that sites have been identified outwith Renfrewshire's urban areas but these have been of a scale which are able to be supported by existing infrastructure, services and facilities.

Its design would comply with the criteria for implementing the spatial strategy – The application is in principle only and therefore these details would require to be assessed through the submission of further planning applications.

It is concluded therefore that application proposal does not comply with Policy P2 - Housing Land Supply.

The Housing Land Supply Supplementary Guidance 2015 (HLSSG) provides a framework for

release of further housing land against which residential planning applications are to be assessed. The HLSSG sets out the circumstances within which the additional release of land for housing will be supported but demands that those sites meet the "main" and "other" considerations.

For the reasons set out earlier in this report, the proposals are not considered to satisfy the first three 'Main Considerations' set out in the HLSSG with reference to (1) Scottish Planning Policy - Sustainability and Placemaking Principles; (2) compliance with the Glasgow and the Clyde Valley Strategic Development Plan - Spatial Development Strategy, sustainable location assessment (Diagram 4) or Strategy Support Measure10; nor the adopted Renfrewshire Local Development Plan - including the Spatial Strategy, Policy P2 - Housing Land Supply of Policy ENV1 - Natural Heritage.

Similarly, the proposals are not considered to have satisfied all of the HLSSG 'Other Considerations' and in particular with reference to failing to create or be contained within robust defensible boundaries, setting a precedent for further expansion, by having a significant effect on the character and amenity of the surrounding area and the potential to impact on the prior provision of infrastructure required by existing housing land allocations which are either not yet consented or are committed.

It is concluded therefore that application proposal does not comply with the framework for release as required by the HLSSG.

The New Development Supplementary Guidance 2014, Places Development Criteria, sets out a number of criteria which new residential developments are required to meet. It considers that development proposals require to ensure that the layout, built form, design and materials of all new developments will be of a high quality; density will require to be in keeping with the density of surrounding areas; surrounding land uses should not have an adverse effect on the proposed residential development and that development proposals should create attractive and well connected street networks which will facilitate movement.

Although the indicative layout illustrates a development set within a degree of landscaping including landscaped edges to the north and south west on the boundaries to the green belt, there is no robust, well defined established defensible green belt edge and it is considered that to allow development in this location could encourage further encroachment into the designated green belt. Given that the application is in principle only, it is not possible to make an assessment in relation to density, design and materials other than that a development of a similar density to surrounding areas could be accommodated within the plot and design and materials could be reflective of the surrounding area.

Policy ENV 3 'Built Heritage' considers that the built heritage which includes listed buildings, should be safeguarded, conserved and enhanced where appropriate. It considers that development proposals 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 in accordance with the provisions set out in the New Development SG. The New Development SG considers that amongst others, development proposals relating to listed buildings and their settings will require to meet a number of criteria in addition to Historic Environment Scotland's, 'Managing Change in the Historic Environment'. In this regard, due to the location of Gryffe Castle to the east of the application site separated from it by a dense tree belt of over 20 metres in width, it is not considered that development of the application site would impact unacceptably on the setting of the listed building, however, the character of the landscape on the approaches from the north west would be altered.

Policy I5, 'Flooding and Drainage' considers that new development must not have an impact on existing drainage infrastructure or increase the risk of flooding elsewhere and requires to be assessed against the New Development SG which sets out a number of criteria which require to be considered. These generally require minimum standards to reduce the risk of

flooding in new developments and to ensure that the risk of flooding is fully considered in the assessment of new development proposals.

In this regard, the Director of Community Resources has offered no objection to the proposal in principle and is satisfied that the DIA submitted in support of the proposal is sufficient at this stage to demonstrate that the site can be appropriately drained. The Director of Community Resources is satisfied that any issues arising from surface water flooding can be addressed through a detailed application.

In relation to the Infrastructure Development Criteria it has been generally demonstrated through the Traffic Assessment (TA) that appropriate access, parking and pedestrian arrangements could be achieved. The Director of Community Resources maintains that a number of conditions are necessary to ensure that the development can be accessed appropriately and to deal with detailed matters.

The SG on 'Contaminated Land' requires sufficient information to be submitted to establish whether contamination is present at an application site so that appropriate conditions can be attached to ensure that the necessary remediation action will be undertaken to prevent unacceptable risks to human health or the environment. In this regard the Director of Community Resources (Environmental Services) is satisfied that sufficient information has been submitted to demonstrate that any potential contamination of the site can be adequately addressed.

With regard to the issues raised through objection and through the pre determination hearing which have not been dealt with in the above assessment, the following conclusions can be made. A large volume of objection relates to matters of the principle of the development, i.e. loss of green belt land and detailed matters which are not known at this time. The site has not been identified through the Adopted Local Development Plan 2014 as a housing site and, for the reasons already outlined, its release from the green belt would not comply with the Spatial Strategy of the plan. Further concerns extend across a number of detailed considerations including number and details of house types, access arrangements and parking. These specific details cannot be assessed through a PPIp application but would be assessed through the mechanism of further detailed applications.

With regard to issues raised in relation to educational capacity and other service provision, it is noted that the Director of Education has highlighted that the existing school provision within the area will require to be addressed.

With regard to wildlife on the site, a Habitat Survey was submitted in support of the application which sets out a series of conditions to ensure that ecological issues are adequately addressed.

The developer sets out a case to suggest that this site could be both deliverable and effective. However, greater weight should be given to the potential of the proposal site to set an undesirable precedent for further green belt development in the surrounding area as applications for development at Branscroft, Kilbarchan, Sandholes Road, Brookfield have been refused and residential development proposals at Whitelintgate, Bridge of Weir are under consideration.

Although planting is proposed it is considered that there would be no well-defined or defensible green belt boundary formed to replace that which already exists. The existing boundary formed by the woodland area provides a more robust settlement edge which should not be compromised or eroded. Development of this site is therefore unacceptable and would not comply with the Spatial Development Strategy of the Approved Strategic Development Plan 2012, Proposed Strategic Development Plan 2016 and Adopted Local Development Plan 2014. Nor does it represent an exception which can be justified through the Housing Land Supply Supplementary Guidance 2015.

Recommendation and reasons for decision

In light of the above assessment, it is concluded that notwithstanding the potential shortfall of an effective land supply, as set out in the Housing Land Supply Supplementary Guidance 2015, the supporting information submitted with the application and the justification provided for the development, it has not been demonstrated that this is an appropriate site for residential development, which would not impact unacceptably on the purposes of the green belt in this location and which can be developed with a defensible green belt boundary. The proposal is therefore considered to be contrary Policy ENV1 and associated New Development Supplementary Guidance. For these reasons it is considered that the proposal cannot satisfy the requirements of Policy P2 and the Housing Land Supply Supplementary Guidance 2015, as the residential development of this site would not comply with the Spatial Strategy of the LDP.

There is no justification for setting aside the policies of the SDP and LDP for a site which is in an unsustainable location and greater weight should be given to the development plan at both strategic and local levels. It is therefore recommended that this application be refused.

RECOMMENDATION

Refuse

Other Action

Conditions and Reasons

- 1 The proposal does not accord with the Spatial Development Strategy and related Spatial Frameworks of the approved Glasgow and the Clyde Valley Strategic Development Plan and Clydeplan's Strategic Development Plan Proposed Plan 2016 in terms of its location and development compatibility and therefore fails to support the Spatial Vision of the Plan.
- 2 The proposal is contrary to Policy ENV 1 of the Adopted Renfrewshire Local Development Plan in that it would result in development within the designated Green Belt without appropriate justification and due to its location and scale would not be commensurate with the aims of maintaining the identity of settlements and protecting and enhancing the landscape setting of an area.
- 3 The proposal is contrary to the Adopted Renfrewshire Local Development Plan New Development Supplementary Guidance - Delivering the Environment Strategy as it does not require a specific green belt location and does not maintain or support an established activity which is suitable in the green belt. The proposal would thereby introduce an inappropriate form of development into the Green Belt, result in an unacceptable erosion of the Green Belt and result in an adverse and detrimental impact on its character.

- 4 The proposal is contrary to Policy P2 of the Adopted Renfrewshire Local Development Plan and the Housing Land Supply Supplementary Guidance 2015, and due to its scale and location, the proposed development would undermine the Spatial Strategy of the Adopted Renfrewshire Local Development Plan. The proposal would thereby introduce an inappropriate form of development into the Green Belt, result in an unacceptable erosion of the Green Belt and result in an adverse and detrimental impact on its character.

Fraser Carlin
Head of Planning and Housing

Local Government (Access to Information) Act 1985 - Background Papers
For further information or to inspect any letters of objection and other background papers, please contact David Bryce on extension 7892.



Renfrewshire
Council

16/0291/PP

Land to North East of Strathgryffe Crescent,
Gryffe Castle, Bridge of Weir



1:6,000

User: ptcameronr1

Date: 11/08/2016



Notes:
Please enter notes here

Ordnance Survey Mapping - © Crown Copyright and database right 2016. All rights reserved. Ordnance Survey Licence number 100023417. Aerial Photography 2009 - Cities Revealed © copyright by The GeoInformation Group, 2009 and Crown Copyright © All rights reserved. Aerial Photography 2004/6 - © 2004 Getmapping plc © 2006 Getmapping plc Aerial Photography 2001 - Cities Revealed © copyright by The GeoInformation Group, 2009 and Crown Copyright © All rights reserved. Historic Map Data - © Crown Copyright and Landmark Information Group Limited 2012. All rights reserved.