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**To: Planning and Property Policy Board**  
**On: 10 November 2015**

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**Report by: Director of Development and Housing Services**

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**Heading: Renfrewshire Housing Land Supply Supplementary Guidance**

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**1. Summary**

- 1.1. The Scottish Government Reporter to the Examination of the Renfrewshire Local Development Plan (LDP) concluded that Renfrewshire has a shortfall in its housing land supply. To address this, the Reporter recommended that the Council prepare Supplementary Guidance (SG), within 1 year of the adoption of the LDP, which would include a detailed framework to guide the release of additional housing land.
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**2. Recommendations**

2.1 It is recommended that the Board:

- (i) Approves the Finalised Renfrewshire Housing Land Supply Supplementary Guidance.
  - (ii) Authorises the Director of Development and Housing Services to submit the Finalised Renfrewshire Housing Land Supply Supplementary Guidance (Appendix 1) to the Scottish Ministers and thereafter adopt the guidance unless directed otherwise by the Scottish Ministers.
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**3. Background**

- 3.1. Scottish Planning Policy requires Councils to identify a generous supply of housing land within the context of the Strategic Development Plan and Renfrewshire Local Housing Strategy.

- 3.2. The strategy approved by Renfrewshire Council in the Adopted LDP sought to deliver 88% of future housing development on brownfield land, supplemented by limited green belt release to provide the “*generous supply of land*” to meet the housing land requirements.
  - 3.3. Notwithstanding this aspiration of Renfrewshire Council, the Reporter appointed to conduct the Examination of the Local Development Plan concluded that Renfrewshire had a shortfall in its housing land supply and in order to address this, recommended that the Council prepare Supplementary Guidance (SG), within 1 year of the adoption of the LDP.
  - 3.4. The Scottish Government Reporter recommended that the Housing SG should include a detailed framework with criteria to allow the Council to consider planning applications that come forward for new residential developments not already identified in the Adopted Renfrewshire LDP.
  - 3.5. Within this context, the Planning & Property Board of May 12<sup>th</sup> 2015, approved Draft Renfrewshire Housing Land Supply Supplementary Guidance. This Draft guidance was subject to a six week consultation during which 27 representations were received (Appendix 2)
  - 3.6. The Finalised Supplementary Guidance attached to this report, has been informed by the representations received and in order to comply with the Scottish Government Reporter’s recommendation is recommended to the Board.
  - 3.7. Members should also note that a “Housing Land Audit 2015” has been carried out, which details the current housing land supply and all available brownfield sites and the 13 greenbelt sites that were identified in the Adopted LDP.
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## **4 Next Steps**

- 4.1 The Finalised Renfrewshire Housing Land Supply Supplementary Guidance requires to be sent to the Scottish Government along with a statement setting out the publicity measures that have been undertaken, the comments received through consultation and an explanation of how these comments were taken into account in the finalised document.
- 4.2 The Scottish Government will then decide whether or not to allow the Council to adopt the SG. Should the Scottish Government not wish to intervene in the adoption of the SG, the Council will adopt the SG, advertising its adoption.
- 4.3 Renfrewshire Housing Land Supply Supplementary Guidance will be ‘statutory’ document forming part of the development plan. It will have the same status for decision making as the Renfrewshire Local Development Plan.

- 4.4 An early review of the LDP is also underway which will entail an extensive engagement and consultation process allowing a robust and fair examination of all housing sites to be carried out through the plan preparation process.
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### **Implications of the Report**

1. **Financial** – None
  2. **HR & Organisational Development** – None
  3. **Community Planning – Jobs and Economy** – The LDP is a key document in establishing a land use framework for supporting, encouraging and delivering economic development in Renfrewshire through investment and are regeneration.
  4. **Legal** - None
  5. **Property/Assets** – None.
  6. **Information Technology** - None
  7. **Equality & Human Rights** - The Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report because it is for noting only. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.
  8. **Health & Safety** – None
  9. **Procurement** – None
  10. **Risk** – None
  11. **Privacy Impact** – None
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### **List of Background Papers**

- (a) Appendix 1 – Responses from the consultation on the draft Renfrewshire Housing Land Supply Supplementary Guidance;
- (b) Appendix 2 – The finalised version of the Renfrewshire Housing Land Supply Supplementary Guidance.

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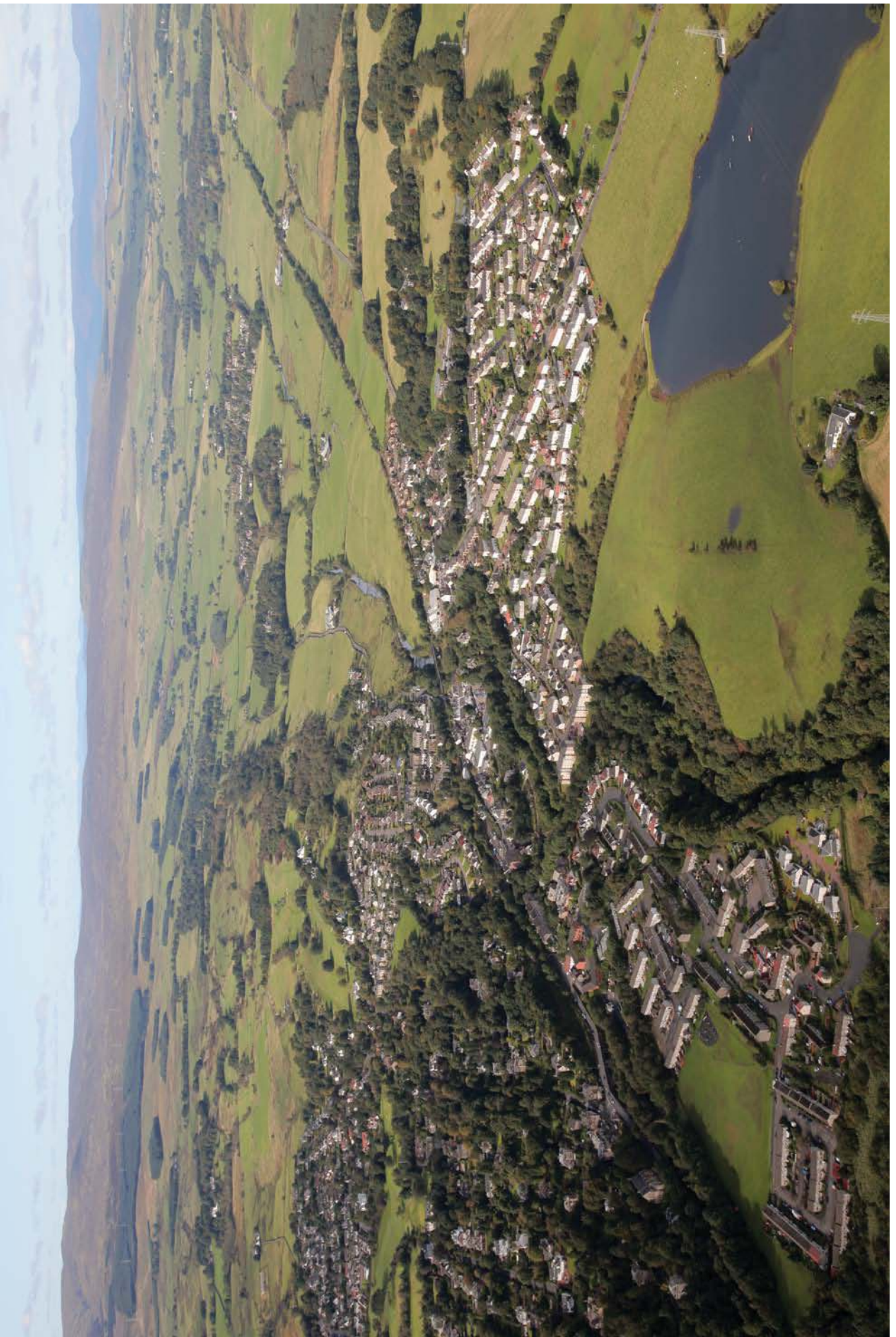


## Renfrewshire Local Development Plan

### Housing Land Supply Supplementary Guidance (2015)



Renfrewshire  
Council



## Introduction

The Renfrewshire Local Development Plan (LDP) is in two parts; the LDP document and New Development Supplementary Guidance (SG). Together these documents set out the overall spatial strategy for Renfrewshire, with key policies, proposals and guidance.

The LDP sets out the strategy, priorities and principles for development in Renfrewshire and the detailed development framework and criteria is contained within supplementary guidance.

Both the local development plan and supplementary guidance outline what developers need to do in designing, delivering and implementing development, with an emphasis on sustainable development and place making.



## Purpose of the Housing Land Supply Supplementary Guidance

Scottish Planning Policy requires Councils to identify a generous supply of land to meet the housing land requirements within the context of the Strategic Development Plan (SDP) and Renfrewshire Local Housing Strategy (LHS).

The Renfrewshire LDP is required to allocate a range of sites for housing which are effective (or capable of becoming effective\*) to meet the housing land requirements up to 10 years beyond the predicted year of the plan adoption, ensuring a minimum of 5 years effective land supply at all times.

The LDP identifies a housing land supply that focuses on brownfield land to meet the majority of the housing land requirements along with a small number of green belt release sites to help stimulate supply in the short term.

In Examining the Renfrewshire LDP, the Reporter concluded that there was a shortfall in housing land in Renfrewshire. The LDP did not identify sufficient land to meet the housing need and demand.

\*Effective Housing Land Supply – The part of the established land supply which is free or expected to be free of development constraints in the period under consideration, and therefore be available for the construction of housing.

## Scottish Government Reporter's Recommendation

To address the potential shortfall in housing land supply, the Reporter recommended that the Council prepare Supplementary Guidance (SG), within 1 year of the adoption of the LDP. The SG is 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.

The Council is required to monitor and review that guidance annually in light of changing circumstances. The Council are then to 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 in the local development plan and the Council's New Development SG.

## **Renfrewshire Housing Land Supply Supplementary Guidance**

In line with the Town and Country Planning (Scotland) Act 1997 and the Town and Country Planning (Development Planning) (Scotland) Regulations 2008, the role of this Housing Land Supply Supplementary Guidance is to provide further information or detail in respect of the policies and/or guidance already set out in the Adopted Renfrewshire LDP and New Development Supplementary Guidance.

In this respect it is considered that identifying or allocating additional housing sites or providing locational preferences is in the SG is not appropriate. Renfrewshire Council consider that this detail would be inconsistent with the conclusions and recommendations of the Reporter appointed by the Scottish Government.

The allocation or identification of preferred sites would also be contrary to Scottish Government policy and advice where the emphasis and importance of front-loading the process through engagement and consultation in the earliest stages is set out to enable views to be reflected in plans and development proposals. Furthermore identifying new housing sites in the SG would also lack the scrutiny of an Examination.

In the preparation of the SG along with the early review of the Adopted Renfrewshire Local Development Plan to address the shortfall in housing land supply, the Council undertook an additional Suggestion for Land Use Change exercise. This helped

to gauge developer interest in relation to investing in Renfrewshire.

Following the Suggestions for Land Use Change exercise, Renfrewshire Council have had discussions with all parties that made representations to the exercise. Each party has been given feedback on submission and an indication as to whether a site could come forward in the short term or medium term or that it does not fit with the overall spatial strategy, policies or guidance framework for Renfrewshire. This approach is considered to provide a more appropriate way forward with dialogue and conversation, resulting in a better understanding of opportunities and issues in Renfrewshire rather than to simply suggesting sites in the supplementary guidance.

In this regard, the Renfrewshire Housing Land Supply SG sets out the framework for how the Council will consider planning applications for housing on sites not allocated in the adopted Renfrewshire LDP, in circumstances where the 5 year effective land supply is not being maintained.

Renfrewshire's 5 year effective land supply is monitored and reviewed on an annual basis through the preparation of the Housing Land Audit (HLA). The HLA will be the monitoring mechanism to gauge the need to release further land to meet the housing land requirements. On this basis the Housing Land Supply Supplementary Guidance will require to be reviewed annually and updated where required, ensuring any shortfall in the housing land supply is identified in the HLA that the SG addresses this and the detailed framework is refreshed where necessary.

The Housing Land Audit 2015 indicates that there is currently a shortfall of 755 private sector units.

| YEAR                                                 | 2015/<br>2016 | 2016/<br>2017 | 2017/<br>2018 | 2018/<br>2019 | 2019/<br>2020 |
|------------------------------------------------------|---------------|---------------|---------------|---------------|---------------|
| HOUSING SUPPLY<br>TARGET                             | 745           | 632           | 632           | 632           | 632           |
| AGREED<br>PROGRAMMING OF<br>CURRENT HOUSING<br>SITES | 462           | 492           | 556           | 498           | 510           |
| SHORTFALL                                            | 283           | 140           | 76            | 134           | 122           |

## How to use the Supplementary Guidance

All residential developments must be assessed against the policies set out in the LDP and the guidance / criteria within the New Development Supplementary Guidance as well as the framework set out in this Housing Land Supply Supplementary Guidance.

The LDP and New Development SG is also supplemented by a series of non statutory Planning Advice Notes which provide good practice examples in relation to design and place, in particular reference must be made to Renfrewshire's Places Residential Design Guide.

## **Delivery of existing sites in the Established Land Supply / Housing Action Programme Sites**

Renfrewshire Council is committed to utilising a variety of enabling mechanisms and innovative approaches to support the delivery of housing on stalled or more complex or challenging sites.

Almost all of these housing sites, which are in the established housing land supply, are previously developed sites in existing residential areas. Many of these sites are vacant and/or derelict and are only challenging due to the nature of the economy and not due to significant constraints.

This SG therefore includes the methods that the Council will use to make the sites in the established housing land supply and the identified housing action programme sites effective and deliverable.

## **Regeneration of Previously Developed Land**

The Renfrewshire LDP Spatial Strategy supports investment which helps to regenerate, create and enhance communities and places, providing high quality new developments in the right locations.

The regeneration of previously developed land, in line with Scottish Planning Policy, the National Planning Framework, the Strategic Development Plan as well as all of Renfrewshire Council's plans, policies and strategies, has made a significant

contribution to the number of residential units built over the last 20 years in Renfrewshire.

Renfrewshire Council expect to see a continuation of this trend, particularly given the amount of brownfield land available for development within Renfrewshire.

The Council's however recognise that despite the strong commitment and priority given over to brownfield sites, a process is required that would allow greenfield sites to be identified within the context of the Council's strategic regeneration priorities.

## **Partnership Working**

The Council see an opportunity to proactively work with others with a flexible and enabling approach to remove constraints/barriers. As such the council will continue to actively engage with Homes for Scotland and the wider development industry on a site by site basis, to find appropriate solutions to development constraints.

### **Housing Action Programme Sites**

The Housing Action Programme Sites were identified in the LDP as being an integral part of the housing land supply. The Council is aiming to enable the implementation of development on these sites by assessing the infrastructure that would be required as part of site implementation works, as well as looking at 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 will require a different method of support or facilitation.

### **Renfrewshire Local Development Plan – Action Programme**

The LDP Action Programme sets out how the objectives, strategy and policies within the LDP can be successfully implemented and delivered along with various actions and partnerships that can support and achieve successful implementation.

There are 10 actions within the Places Strategy section which specifically refer to how Renfrewshire Council along with partners and stakeholders will progress actions to make more housing sites effective.

### **Development Briefs**

The Council is also committed to enabling and supporting many of the housing development sites that have not been successfully delivered over the years.

The Council have started this process by identifying areas where there have been a number of smaller vacant and derelict sites within or on the edge of our town centres, where planning consent for housing has been given and the sites have stalled.

Development briefs are being prepared outlining a vision of how collectively regenerating an area together with various parties and landowners, that that this could make sites more viable, available and therefore more effective. The Council is to develop, implement and roll out this approach in various locations throughout Renfrewshire.

### **Planning Obligations**

The adopted LDP does not set out any policies on developer contributions. The Council consider this is a proactive approach to encouraging development in the right places where the delivery of development is not reliant on large infrastructure investment.

The Council encourage early discussions with developers and key agencies with an aim of implementing suitable development which will have minimal impact on existing infrastructure, timescales or budgets. Developers are still required to make good any infrastructure deficits associated with any new development.

In considering the implementation of planning obligations associated with existing residential consents, consideration will be given to the use of staged or deferred payments to assist development at a site and generate revenue before paying the full costs of related infrastructure.

## Framework for the release of further housing land

Each planning application for residential development will be assessed on its merits and in accordance with the following criteria. Additional land release for housing will be supported where it meets the main and other considerations.

### Main Considerations

- Scottish Planning Policy – Sustainability and Placemaking Policy Principles,
- Compliance with the Glasgow and the Clyde Valley Strategic Development Plan – Spatial Development Strategy and indicative compatible development (Diagram 3), Sustainable location assessment (Diagram 4) and Strategy Support Measure 10 – Housing development and local flexibility;
- Renfrewshire Local Development Plan – Spatial Strategy (Implementing the spatial Strategy – page 4), Policy P1 – Renfrewshire’s Places, Policy P2 – Housing Land Supply, Policy P7 – Green Network, Policy P8 – Open Space, Policy ENV1 – Green Belt, Policy ENV 2 – Natural Heritage, Policy, ENV 3 – Built Heritage, Policy ENV 4 – The Water Environment, Policy ENV5 – Air Quality, Policy I5 – Flooding and Drainage, Policy I7 – Low Carbon Developments
- Renfrewshire Local Development Plan New Development Supplementary Guidance;
- Renfrewshire’s Places Residential Design Guide;

### Other Considerations

- Supporting information to demonstrate the effectiveness of the site and guarantee delivery in the short term (up to 2019) must be submitted with any planning application for residential development;
- Details of the phasing of the development will require to be submitted with any planning application;
- The site must be capable of being substantially built out by 2019. Should development not commence by 2019 the sites will revert back to green belt land designation;
- Compliance with The Scottish Government Planning Advice Note 2/2010 in relation to the assessment of effectiveness is required to be demonstrated;
- Proposed housing sites must create or be contained within robust defensible boundaries and must not set a precedent for subsequent future expansion;
- It must be demonstrated that sufficient infrastructure is available or can be made available by the developer or another party within a timescale that allows for early house completions;
- Proposals for residential development must not be dependent on the prior provision of infrastructure required

by existing housing land allocations that do not yet have planning permission or are committed but have not started;

- Scale of the site – This SG does not apply to planning applications for single or small groups of houses (5 or less). The scale should also be such that it can contribute to the short term needs of the housing land supply;
- Development sites should be able to co-exist with existing surrounding uses, having no significant affect on the character and amenity of the surrounding area;
- The use of processing agreements will be used to ensure that the Council deal with planning applications expeditiously, to support the early delivery of housing on sites;

## Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

### Appendix 2 - Modifications for Final Version

| Representation                                           | Summary of Representation                                                                                                                                                                                                                                                                                                                                              | Suggested alteration / addition                                                                                                                                                                          | Planning Authority's Response                                                                                                                                                                                                                          |
|----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| HSG 0001 – Morag Vaughan                                 | There is no need for further housing in Bridge of Weir particularly when there is not adequate infrastructure or facilities to support current homes and residents.                                                                                                                                                                                                    | No suggested alteration or addition – just no more housing in Bridge of Weir.                                                                                                                            | No change to finalised supplementary guidance. The Housing Land Supply Supplementary Guidance (SG) simply sets an additional policy framework for the considering residential proposals that come forward –                                            |
| HSG 0002 – Strathclyde Partnership for Transport (SPT)   | No representations to draft Housing Land Supply Supplementary Guidance.                                                                                                                                                                                                                                                                                                | No suggested alteration or addition.                                                                                                                                                                     | No change to finalised supplementary guidance.                                                                                                                                                                                                         |
| HSG 0003 – Scottish Natural Heritage (SNH)               | Given that the development proposals coming forward will not have been subjected to the same level of scrutiny and assessment through SEA and site selection assessments, it is recommended that Policy ENV2 – Natural Heritage is added to the 'Main Considerations' section (page 6) This should ensure that protected species are considered during site selection. | Recommend that Policy ENV2 – Natural Heritage is added to the 'Main Considerations' section (page 6).                                                                                                    | Agreed - Policy ENV2 – Natural Heritage added to the 'Main Considerations' section (page 6).                                                                                                                                                           |
| HSG 0004 – Scottish Environment Protection Agency (SEPA) | Support the view of the Council that the allocation of additional housing sites should be brought forward through a full review of the Renfrewshire Local Development Plan (LDP).                                                                                                                                                                                      | Recommend bullet point 4 'Physical – Other Considerations (page 6), a reference is included to issues of co-location.<br><br>Recommend bullet point 4 'Infrastructure – Other Considerations (page 7), a | Agreed – However bullet point 4 simply sets out the considerations in relation to the Scottish Government Planning Advice Note 2/2010 so these cannot be altered.<br><br>These two new points to the 'main and other consideration' section of the SG. |

## Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

### Appendix 2 - Modifications for Final Version

| Representation                                          | Summary of Representation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Suggested alteration / addition                                                                                                                                                                                                                                                                                                                                                                                                         | Planning Authority's Response                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                         | In terms of the draft Housing Land Supply Supplementary Guidance we would recommend two additions to the finalised Housing Land Supply Supplementary Guidance in order to protect the environment.                                                                                                                                                                                                                                                                                                                                         | reference to foul drainage as an infrastructure consideration is included.                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| HSG 0005 - Kilbarchan Community Council                 | Fully support Renfrewshire Council's Housing Land Supply Supplementary Guidance.                                                                                                                                                                                                                                                                                                                                                                                                                                                           | No suggested alteration or addition.                                                                                                                                                                                                                                                                                                                                                                                                    | No change to finalised supplementary guidance.                                                                                                                                                                                                                                                                                                                                                                                                                    |
| HSG 0006 - GL Hearn on behalf of Hallam Land Management | <p>The SG should indicate the Council's spatial preferences to meet the housing land shortfall, this would provide certainty to where additional development should go, without this the SG becomes a reiteration of the policies already in the LDP, leading to planning by appeal.</p> <p>The SG should indicate the sites not considered favourable by the Planning Authority, with weighting in favour of new sites that have not previously been considered through the LDP process.</p> <p>There is a need for the SG to clearly</p> | <p><b>Page 2 (paragraph 12):</b> Remove reference in the final sentence to a full LDP review being required</p> <p><b>Page 2 (Paragraph 9):</b> Refer to the identified shortfall of 1000 homes</p> <p><b>Page 3 (Paragraph 2):</b> Delete the first paragraph under the heading 'Renfrewshire Housing land SG'</p> <p><b>Pages 4 &amp; 5 (All paragraphs):</b> We consider that all of the text on pages 4 and 5 should be deleted</p> | <p>Agreed - This paragraph has been altered.</p> <p>Agreed - The shortfall as at 2015 has been added to the SG.</p> <p>Agreed – This paragraph has been altered.</p> <p>No change - In line with Scottish Planning Policy (SPP), the SG aims to direct developments towards sites in existing settlements and where possible make effective use of existing infrastructure. SPP identifies brownfield sites are preferable to greenfield sites. The SG simply</p> |

# Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

## Appendix 2 - Modifications for Final Version

| Representation            | Summary of Representation                                                                                                                                                                                                                                                                         | Suggested alteration / addition                                                                                                                                                                                                                                                                                                                                                                                                                                | Planning Authority's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                           | state the housing shortfall figure.                                                                                                                                                                                                                                                               | <p><b>Page 6 (Criterion 4 - Physical):</b> Amend final sentence so that it makes reference to developments being substantially complete by 2019. This would ensure consistency with criterion 3 under 'other considerations'</p> <p><b>Page 7:</b> Introduce an additional criterion giving a positive weighting to sites which were not dismissed by the Council and by the Reporter as being not suitable for allocation within the recently adopted LDP</p> | <p>reinforces this aiming to ensure all housing sites are able to be delivered.</p> <p>No change - The criteria set out here simply reflect that stated in the Scottish Government Planning Advice Note, PAN 2/2010. The text at this bullet point will be amended simply to state that there should be compliance with PAN 2/2010.</p> <p>No change - The aim of the SG is to provide a detailed framework to guide the release of additional land. The assessment of sites will be undertaken as and when planning applications come forward to be assessed against the LDP, the New Development Supplementary Guidance and the Housing Land Supply Supplementary Guidance.</p> |
| HSG 0007 – Scottish Water | <p>Scottish Water is committed to working with the Council on the delivery of the LDP and will continue to work with the Council to highlight where there is available capacity within Scottish Water's network.</p> <p>Insufficient capacity should not be seen as a barrier to development.</p> | No suggested alteration or addition.                                                                                                                                                                                                                                                                                                                                                                                                                           | No change to finalised supplementary guidance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

# Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

## Appendix 2 - Modifications for Final Version

| Representation                          | Summary of Representation                                                                                                                           | Suggested alteration / addition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Planning Authority's Response                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                         | Where new development necessitates infrastructure, developers will be required to fund this, meeting the costs of all local network infrastructure. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| HSG 0008 – Brookfield Community Council | No substantive comments to make on the principles set out in the SG, but alterations and additions requested.                                       | <p><b>Other Considerations</b></p> <p><b>Bullet point 2</b> should read: Details of the phasing of the development will require to be submitted with any planning application.</p> <p><b>Bullet point 4</b> should read: the site is free from constraints related to slope aspect, flood risk, ground stability drainage issues or vehicular access which would preclude its development. Where there is solid commitment to removing the constraints by 2019, the site will be considered.</p> <p><b>Bullet point 7:</b> It must be demonstrated that sufficient infrastructure is available or can be made available by the developer or another party, within a timescale that allows for early completions.</p> | <p>Agreed - changed in SG.</p> <p>No change - The criteria set out here simply reflect that stated in the Scottish Government Planning Advice Note, PAN 2/2010. The text at this bullet point will be amended simply to state that there should be compliance with PAN2/2010.Flooding and drainage considerations are already covered by Policy ENV4 – The Water Environment in the adopted LDP.</p> <p>Agreed - changed in SG.</p> |

# Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

## Appendix 2 - Modifications for Final Version

| Representation                | Summary of Representation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Suggested alteration / addition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Planning Authority's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| HSG 0009 – Homes for Scotland | <p>Homes for Scotland reject the approach taken in the draft SG. To rely on broad criteria for assessment rather than identifying sites is considered the wrong way to ensure early delivery of new sites.</p> <p>Astonished that the Council has adopted the stance that the SG risks weakening the recently adopted LDP and that the Council argues that an early review of the LDP offers a more co-ordinated way forward to deal with new housing sites.</p> <p>Considered that the SG might identify specific sites in the SG and that this would have offered a degree of certainty. The principle of the development would be established subject to detailed matters.</p> <p>The entire process lacks transparency</p> | <p><b>Additional paragraph</b><br/>Proposed developments within a green belt will only be considered if the development is proportionate to the existing size of the site.</p> <p>The Council should:<br/><br/>Publish the results of the Suggestions for Land Use Change exercise and it's assessment of the suitability of all submitted sites</p> <p>Identify in the Guidance a range of preferred housing sites</p> <p>Demonstrate with reference to the housing requirements of the Strategic Plan and to the effective housing land</p> | <p>No change - this criterion is set out in the existing adopted LDP New Development Supplementary Guidance.</p> <p>No change - The Suggestions for Land Use Change exercise was undertaken to gauge the level of interest in Renfrewshire as the Council prepares to review the current LDP. It is work in progress and the assessment of this exercise along with any further Suggestions for Land Use Change exercises to inform the review of the LDP will be published alongside the Renfrewshire Local Development Plan Main Issues Report in 2016.</p> <p>No change - It would be contrary to the advice of Circular 6/2013 – Development Planning to require identification or allocation of housing sites without the scrutiny of an examination or extensive consultation and engagement as required by legislation.</p> <p>Agreed - The shortfall as at 2015 has been added to the SG.</p> |

## Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

### Appendix 2 - Modifications for Final Version

| Representation               | Summary of Representation                                                                                                                                                                                                                                                                                                                                                                                          | Suggested alteration / addition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Planning Authority's Response                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              | or any opportunity for consultees to comment in any meaningful way on the Council's assertion that a plan-led approach is the best way to deliver more new housing.                                                                                                                                                                                                                                                | supply how these additional sites can collectively meet the shortfalls in effective housing land to 2019                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                  |
| HSG 0010 –<br>Gleddoch Hotel | <p>The draft SG is helpful, but should be altered to identify only greenbelt sites.</p> <p>Suggest that green belt sites which have an existing or previous use be favoured more than 'virgin greenbelt' land.</p> <p>The SG should encourage housing that is not mainstream style housing. The SG should include the expansion of existing businesses in the greenbelt allowing enabling development formats.</p> | <p>The 'Main' and 'Other' considerations of the framework should be qualified by additional criteria along the following lines:-</p> <p>Preference will be given to sites that substantially meet the following criteria:</p> <p>Are located in the greenbelt and already have an existing, non-agricultural, use;</p> <p>Are within the five economic strategies/ locations identified in policies E1 to E5 of the approved LDP;</p> <p>Are not already identified in schedule 3 of the approved LDP;</p> <p>Can accommodate new residential development of an appropriate scale that does not detract from the primary existing use of the land, EG Tourism;</p> | <p>No change – Policy ENV1 – Green Belt in the current LDP has set out this criterion.</p> <p>No change – this would be contrary to the overall spatial strategy set out in the LDP.</p> <p>No change – the housing SG is a detailed framework to guide the release of additional housing land.</p> <p>No change - this criterion is set out in the existing adopted New Development Supplementary Guidance.</p> |

## Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

### Appendix 2 - Modifications for Final Version

| Representation                 | Summary of Representation                                                                                                                                                                                                                             | Suggested alteration / addition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Planning Authority's Response                                                                                                                                                                                                                                        |
|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                |                                                                                                                                                                                                                                                       | Can assist the enablement and expansion (both words defined widely) of the primary established use.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | No change – Any housing proposal in the greenbelt, whether they enabled further economic development or not, will require to be assessed in the same way through the LDP, New Development Supplementary Guidance and the Housing Land Supply Supplementary Guidance. |
| HSG 0011 – Scottish Government | Concerned that the SG does not comprehensively fulfil the expectations of the Reporter's recommendations. In particular the SG does not provide a sufficient framework to deliver the further sites need to provide an effective and generous supply. | <p>The supplementary guidance document should:</p> <p>Maintain reference to the shortfall in housing land in the LDP, as noted at page 2, column 3, paragraph 1 but remove the earlier and contradictory reference to an adequate housing land supply, as noted as page 2, column 2, paragraph 3.</p> <p>Set out clearly the scale and nature of the shortfall that needs to be addressed to ensure an effective and generous housing supply, as concluded by the Reporter in the examination report. This will inform the monitoring and review of the SG.</p> <p>Provide a thorough explanation why sites have not been identified within the SG. This is because stakeholder expectations</p> | <p>Agreed - changed in SG.</p> <p>Agreed - The shortfall as at 2015 has been added to the SG.</p> <p>Agreed – changed in SG.</p>                                                                                                                                     |

# Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

## Appendix 2 - Modifications for Final Version

| Representation | Summary of Representation | Suggested alteration / addition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Planning Authority's Response                                                                |
|----------------|---------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
|                |                           | <p>will have been raised from the 'Suggestion for Land Use Change' exercise, where the 'What happens next' section noted that the Draft SG would identify appropriate sites which could assist in meeting the housing shortfall. The change in approach will have sent conflicting messages to stakeholders.</p> <p>Set out how the information for the 'Suggestion for Land Use Change' exercise has informed the SG.</p> <p>Set out how the required annual monitoring and review of the SG will be undertaken, e.g. the timescale and procedures, and how this will relate to the Housing Land Audit.</p> <p>Expand further on what actions can be taken by the Council corporately to make housing sites effective. This could be linked to the Action Programme for the LDP where relevant stakeholders and specific actions can be identified to progress individual sites, for example identifying the nature of any constraint and steps to address it. Page 29 of the LDP refers to a 'Programme of Delivery'</p> | <p>Agreed – changed in SG.</p> <p>Agreed – changed in SG.</p> <p>Agreed – changed in SG.</p> |

# Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

## Appendix 2 - Modifications for Final Version

| Representation         | Summary of Representation                                                                                                                                                                                                                                                                          | Suggested alteration / addition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Planning Authority's Response                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                        |                                                                                                                                                                                                                                                                                                    | <p>and to general approaches which should be detailed for the relevant sites in the associated Action Programme. As part of the related Action Programme work, there should be an identification of any infrastructure requirements and likely planning obligations.</p> <p>Signal the Council's commitment to addressing the shortfall through a timely review of the LDP.</p> <p>Overall, be more clearly positive in tone. The document could be framed 'Additional land release will be supported where ...'.</p> | <p>Agreed – changed in SG.</p> <p>Agreed – changed in SG.</p>                                                                                                                                                                                                                                                                                                                                         |
| HSG 0012 – Graham Auld | <p>The SG is too vague and allows a wide interpretation. It does not put enough protection for greenbelt land emphasising the clear function and role of the greenbelt.</p> <p>There should be protection of greenbelt land where there exists interesting historic features in the landscape.</p> | <p>Page 6 – Other Considerations – Amend to "Ownership – the site is in the ownership or control of a party which can be expected to develop it or to release it for development. Ownership in itself will not be a reason to allow development"</p> <p>The following should be added – "Release of Green Belt land will be refused where Government monies have been utilised to protect and enhance the environmental significance of the land."</p>                                                                | <p>No change - The criteria set out here simply reflect that stated in the Scottish Government Planning Advice Note, PAN 2/2010. The text at this bullet point will be amended simply to state that there should be compliance with PAN2/2010.</p> <p>No change – Existing policies in the LDP ensure the protection and enhancement of the environmental significance of the land is considered.</p> |

# Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

## Appendix 2 - Modifications for Final Version

| Representation                                         | Summary of Representation                                                                                                                                                                                                                                                                                                                                                                                  | Suggested alteration / addition                                                                                                                                                                                                                                                                                                                                                    | Planning Authority's Response                                                                                                                                                    |
|--------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| HSG 0013 – John Dickie                                 |                                                                                                                                                                                                                                                                                                                                                                                                            | The following should be added – “Release of Green Belt land will be refused where there exists interesting historical features in the landscape”.                                                                                                                                                                                                                                  | No change – Existing policies in the LDP ensure the protection and enhancement of the environmental significance of the land is considered.                                      |
|                                                        | The SG is welcomed and provides a clearer context to assessing housing proposals. This approach should assist in facilitating flexibility within the housing land supply.                                                                                                                                                                                                                                  | No suggested alteration or addition.                                                                                                                                                                                                                                                                                                                                               | No change to finalised supplementary guidance.                                                                                                                                   |
| HSG 0014 – Montagu Evans on behalf of Erskine Hospital | Request that a specific site within Renfrewshire is considered in line with the LDP and the Housing Land Supply Supplementary Guidance when finalised.                                                                                                                                                                                                                                                     | No suggested alteration or addition.                                                                                                                                                                                                                                                                                                                                               | No change to finalised supplementary guidance.                                                                                                                                   |
| HSG 0015 – GL Hearn on behalf of Taylor Wimpey         | The SG should indicate the Council's spatial preferences to meet the housing land shortfall, this would provide certainty to where additional development should go, without this the SG becomes a reiteration of the policies already in the LDP, leading to planning by appeal.<br><br>The SG should indicate the sites not considered favourable by the Planning Authority, with weighting in favour of | A 'detailed framework' with a spatial dimension and clear preferred and non-preferred criteria should be included to 'guide' prospective applicants and inform the Council's consideration of applications, all as required by the Reporter's report.<br><br>Clarity should be provided regarding the Council's position on the number of units of shortfall to be met via the SG. | No change – a detailed framework has been provided with <i>preferred</i> criteria set out to guide applicants.<br><br>Agree - The shortfall as at 2015 has been added to the SG. |

## Appendix 2 - Modifications for Final Version

[illegible]

# Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

## Appendix 2 - Modifications for Final Version

| Representation                                 | Summary of Representation                                                                                                                                                                                                                                                                       | Suggested alteration / addition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Planning Authority's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                | <p>The SG should indicate the sites not considered favourable by the Planning Authority, with weighting in favour of new sites that have not previously been considered through the LDP process.</p> <p>There is an absolute need for the SG to clearly state the housing shortfall figure.</p> | <p>Clarity should be provided regarding the Council's position on the number of units of shortfall to be met via the SG.</p> <p>The assessment of previously considered sites should be presented.</p> <p>A clear statement should be made that greenfield sites will be necessary and accepted, subject to detailed considerations, to help meet the shortfall.</p> <p>A 'detailed framework' with a spatial dimension and clear preferred and non-preferred criteria should be included to 'guide' prospective applicants and inform</p> | <p>Agreed - The shortfall as at 2015 has been added to the SG.</p> <p>No change – an assessment of each site submitted through the preparation of the current LDP was given and examined by the Scottish Government Reporter. The recent Suggestions for Land Use Change exercise carried out in Jan / Feb 2015 was undertaken to gauge the level of interest in Renfrewshire as the Council prepares to review the current LDP. It is work in progress and the assessment of this exercise along with any further Suggestions for Land Use Change exercises to inform the review of the LDP will be published alongside the Renfrewshire Local Development Plan Main Issues Report in 2016.</p> <p>Agreed – changed in SG.</p> <p>No change – a detailed framework has been provided with <i>preferred</i> criteria set out to guide applicants.</p> |
| HSG 0017 – GL Hearn on behalf of Taylor Wimpey | The SG should indicate the Council's spatial preferences to meet the housing land shortfall, this would provide certainty to where additional                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

Appendix 2 – Modifications for Final Version

| Representation | Summary of Representation                                                                                                                                                                                                                                                                                                                                                                                                                  | Suggested alteration / addition                                                                                                                                                                                                                                                                                                                                                                                                                                    | Planning Authority's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                | <p>development should go, without this the SG becomes a reiteration of the policies already in the LDP, leading to planning by appeal.</p> <p>The SG should indicate the sites not considered favourable by the Planning Authority, with weighting in favour of new sites that have not previously been considered through the LDP process.</p> <p>There is an absolute need for the SG to clearly state the housing shortfall figure.</p> | <p>the Council's consideration of applications, all as required by the Reporter's report.</p> <p>Clarity should be provided regarding the Council's position on the number of units of shortfall to be met via the SG.</p> <p>The assessment of previously considered sites should be presented.</p> <p>A clear statement should be made that greenfield sites will be necessary and accepted, subject to detailed considerations, to help meet the shortfall.</p> | <p>Agreed - The shortfall as at 2015 has been added to the SG.</p> <p>No change – an assessment of each site submitted through the preparation of the current LDP was given and examined by the Scottish Government Reporter. The recent Suggestions for Land Use Change exercise carried out in Jan / Feb 2015 was undertaken to gauge the level of interest in Renfrewshire as the Council prepares to review the current LDP. It is work in progress and the assessment of this exercise along with any further Suggestions for Land Use Change exercises to inform the review of the LDP will be published alongside the Renfrewshire Local Development Plan Main Issues Report in 2016.</p> <p>Agreed – changed in SG.</p> |

## Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

### Appendix 2 - Modifications for Final Version

| Representation                                             | Summary of Representation                                                                                                                                                                                                                                                                                                                                                                                                                     | Suggested alteration / addition                                                                                                                                                                                                                      | Planning Authority's Response                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| HSG 0018 – Dawn Group                                      | <p>Concerned that the Suggestions for Land Use Change exercise came before the Housing SG it would have been more logical to have the exercise after.</p> <p>Dawn are comfortable with the framework in the SG, it represents the criteria based approach that they would apply when promoting a site for inclusion in a development plan.</p>                                                                                                | No suggested alteration or addition.                                                                                                                                                                                                                 | No change - The recent Suggestions for Land Use Change exercise carried out in Jan / Feb 2015 was undertaken to gauge the level of interest in Renfrewshire as the Council prepares to review the current LDP.                                                                                                                                     |
| HSG 0019 – Colliers on behalf of Andrew Forrest Properties | <p>Disagree with the approach taken in the SG, considered that sites should have identified sites to provide certainty.</p> <p>Confirmed that there is no legislation that precludes the allocation of specific sites within supplementary guidance.</p> <p>Concern regarding the timing of the Suggestions for Land Use Change exercise.</p> <p>The SG does not provide sufficient detail to allow developers to proceed with certainty.</p> | Allocate specific sites for housing development within Supplementary Guidance, or, at the very least, ensure that the Detailed Framework which would allow the identification of additional land to address the acknowledged shortfall is delivered. | <p>No change - It would be contrary to the advice of Circular 6/2013 – Development Planning to require identification or allocation of housing sites without the scrutiny of an examination or extensive consultation and engagement as required by legislation.</p> <p>Agreed - The SG has been altered to provide a more detailed framework.</p> |

Appendix 2 - Modifications for Final Version

| <b>Representation</b>                                                                         | <b>Summary of Representation</b>                                                                                                                                                                                                                                            | <b>Suggested alteration / addition</b> | <b>Planning Authority's Response</b>           |
|-----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|------------------------------------------------|
| HSG 0020 –<br>Leith Planning                                                                  | Supportive of the Council's aspirations in the enabling policy framework as set out in the SG and the willingness to approve green belt sites where the various criterion are met.                                                                                          | No suggested alteration or addition.   | No change to finalised supplementary guidance. |
| HSG 0021 –<br>Campbell &<br>McCartney<br>Solicitors on<br>behalf of Mr<br>Stewart<br>McGregor | Concern regarding the lack of provision for sites for gypsy/travellers in the LDP.<br><br>Consider that an individual site within Renfrewshire would fit with the framework and would provide an opportunity to rectify a serious omission in the LDP for gypsy/travellers. | No suggested alteration or addition.   | No change to finalised supplementary guidance. |
| HSG 0022 –<br>Campbell &<br>McCartney<br>Solicitors on<br>behalf of Mr<br>John Burke          | Concern regarding the lack of provision for sites for gypsy/travellers in the LDP.<br><br>Consider that an individual site within Renfrewshire would fit with the framework and would provide an opportunity to rectify a serious omission in the LDP for gypsy/travellers. | No suggested alteration or addition.   | No change to finalised supplementary guidance. |

# Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

## Appendix 2 - Modifications for Final Version

| Representation                                                              | Summary of Representation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Suggested alteration / addition                                                                                                                                                          | Planning Authority's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| HSG 0023 –<br>Colliers on<br>behalf of<br>Mactaggart<br>and Mickel<br>Homes | <p>Considered that the SG should identify specific sites in the SG and that this would have offered a degree of certainty.</p> <p>Falls short of the required detailed framework.</p> <p>The SG provides little or no guidance for developers looking to invest in Renfrewshire.</p> <p>The SG should indicate the Council's spatial preferences to meet the housing land shortfall, this would provide certainty to where additional development should go.</p> <p>The SG should include a statement as to under what circumstances applications would be considered premature.</p> | No suggested alteration or addition.                                                                                                                                                     | <p>No change - It would be contrary to the advice of Circular 6/2013 – Development Planning to require identification or allocation of housing sites without the scrutiny of an examination or extensive consultation and engagement as required by legislation.</p> <p>Agreed - The SG has been altered to provide a more detailed framework.</p> <p>No change - The SG simply follows the recommendations of the Scottish Government Reporter. The Reporter's recommendations do not suggest that the SG should provide spatial preferences or locations.</p> <p>No change - To indicate what circumstances applications will be considered premature, would prejudice applications that require to be discussed in detail with the Planning Authority.</p> |
| HSG 0024 –<br>Gladman<br>Developments<br>Ltd                                | The Council requires to comply with the Scottish Government Reporter's recommendation in order to comply fully with SPP.                                                                                                                                                                                                                                                                                                                                                                                                                                                             | The SG should set out how processing agreements can be used to ensure that the Council deal with planning applications expeditiously to ensure that delayed decisions do not prevent the | Agreed – changed in SG.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

# Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

## Appendix 2 - Modifications for Final Version

| Representation | Summary of Representation                                                                                               | Suggested alteration / addition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Planning Authority's Response                                                                                                                                                                                                                                                                                     |
|----------------|-------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                | Considered that the SG should identify specific sites in the SG and that this would have offered a degree of certainty. | <p>early delivery of housing developments.</p> <p>The 'main considerations' should make reference to the presumption in favour of sustainable development prescribed in Scottish Planning Policy and the 13 guiding principles set out paragraph 29, wish is a significant material consideration when a local authority is faced with a shortfall in the 5-year effective land supply, as is the case in Renfrewshire.</p> <p>Although the housing shortfall is most apparent in the period up to 2019, it would be more logical for the supplementary guidance to consider delivery in the short term as being up to 2020 (a 5 year period).</p> <p>Bullet point 6 under section 'other considerations' should be changed to:<br/> <i>"Proposed housing sites must create or be contained within robust defensible boundaries and must not set a precedent for subsequent future expansion."</i></p> <p>Bullet point 8 under section 'other considerations' should be deleted – Gladman is not aware of any</p> | <p>Agreed – changed in SG.</p> <p>No change - The current LDP was adopted in 2014. A revised LDP should be in place by 2019 with update supplementary guidance for that plan. It is therefore not appropriate to extend the timescales to 2020.</p> <p>Agreed – changed in SG.</p> <p>Agreed – changed in SG.</p> |

# Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

## Appendix 2 - Modifications for Final Version

| Representation                                  | Summary of Representation                                                                                                                                                                                                                                                                                                                             | Suggested alteration / addition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Planning Authority's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| HSG 0025 – Savills on behalf of Glentyan Estate | <p>Considered that the SG should identify specific sites in the SG and that this would have offered a degree of certainty.</p> <p>The result of the SG will be planning by appeal.</p> <p>The Council should assess the sites submitted to the Suggestions for Land Use Change exercise and report it to Board which would allow proper scrutiny.</p> | <p>infrastructure providers who allow infrastructure capacity to be reserved.</p> <p>This Supplementary Guidance as currently formed should be re-presented including recommendations on suitable allocations to meet Renfrewshire's identified shortfall in housing land allocations.</p> <p>If housing proposals are required to be heard at appeal as a result of this Supplementary Guidance being approved as currently formed, there is a likelihood that house builders and developers will seek costs against the Council as a result of any excessive delay or cost to them borne as a result of this Supplementary Guidance.</p> | <p>No change - It would be contrary to the advice of Circular 6/2013 – Development Planning to require identification or allocation of housing sites without the scrutiny of an examination or extensive consultation and engagement as required by legislation.</p> <p>No change - The SG simply follows the recommendations of the Scottish Government Reporter. The Reporter's recommendations do not suggest that the SG should provide spatial preferences or locations.</p> |
| HSG 0026 – Environplan Consulting               | <p>The SG should ensure all tenures of housing is accommodated in particular mid to high end quality developments in low density, high landscape areas rather than just a black and white land use policy framework that promotes mainstream housing.</p>                                                                                             | <p>It is considered advantageous to allow the promotion of more ambitious innovative housing developments to meet an unmet demand for up market lower density high landscaped housing allocations.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>No change - The Renfrewshire LDP, New Development Supplementary Guidance and non-statutory supplementary planning guidance 'Renfrewshire's Places' all aim to provide a range and choice of housing, for all tenures, across Renfrewshire. There is no requirement to make any distinction in the SG for mid to high end quality developments in low density, high landscape areas.</p>                                                                                        |

## Renfrewshire Local Development Plan – Housing Land Supply Supplementary Guidance

### Appendix 2 - Modifications for Final Version

| Representation                                             | Summary of Representation                                                                                                                                                                                                                                                                                                                                                                                         | Suggested alteration / addition      | Planning Authority's Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| HSG 0027 – Bryce Associates on behalf of Elderslie Estates | <p>Considered that the SG should identify specific sites in the SG and that this would have offered a degree of certainty.</p> <p>Such a criteria based approach is not plan-led and does not conform to the spirit of Scottish Planning Policy.</p> <p>It would be more pragmatic for developers to engage with the Council at the early stages of the review of the LDP to bring new housing sites forward.</p> | No suggested alteration or addition. | <p>No change - It would be contrary to the advice of Circular 6/2013 – Development Planning to require identification or allocation of housing sites without the scrutiny of an examination or extensive consultation and engagement as required by legislation.</p> <p>No change - The SG simply follows the recommendations of the Scottish Government Reporter. The Reporter's recommendations do not suggest that the SG should provide spatial preferences or locations.</p> <p>No change - Renfrewshire Council welcome the approach of developers bringing new housing sites through the review of the LDP.</p> |