

RENFREWSHIRE COUNCIL

Application No: 16/0806/PP

DEVELOPMENT AND HOUSING SERVICES
RECOMMENDATION ON PLANNING APPLICATION

Regd: 06/12/2016

Applicant

Agent

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Nature of proposals:

Erection of residential development (in principle).

Site:

Site on Northern boundary of Beech Burn, Johnshill, Lochwinnoch

Application for:

Planning Permission in Principle

Introduction

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

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

The Pre Determination Hearing took place at the Planning and Property Policy Board on 14th March 2017.

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

Description

This application seeks planning permission in principle for the erection of a residential development on an area of open grassland to the east of Johnshill, Lochwinnoch. The site extends to approximately 7.5 hectares in area, and is bound by residential properties to the west with Lochwinnoch beyond, open countryside to the south with Castle Semple and Barr Lochs Sites of Special Scientific Interest (SSSI) beyond, and open countryside to the north and east with Park Hill Woods Site of Interest for Nature Conservation (SINC) beyond. The site slopes downhill from the western boundary towards Castle Semple.

As the application is in principle only, no details of the proposed residential layout have been provided. However within the supporting information, the applicant has advised that the site could accommodate 100 units, with the primary vehicle access taken from Johnshill.

History

16/0548/EO - Request for screening opinion as to the requirement for an Environmental Impact Assessment for a residential development. Environmental Assessment not Required 26/08/2016.

16/0529/NO - Proposal of Application Notice relating to the erection of a residential development. Accepted 16/08/2016.

91/0186/PP - Residential development (in outline). Refused 25/06/1991. Appeal dismissed 10/07/1992.

90/0499/PP - Residential development (in outline). Refused 05/09/1990.

Policy & Material Considerations

Scottish Planning Policy

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

Glasgow and the Clyde Valley Strategic Development Plan 2012

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

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

The Proposed SDP is a material consideration as it is the settled view of the Clydeplan Authority of which Renfrewshire Council is a constituent part.

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

Adopted Renfrewshire Local Development Plan 2014

Policy ENV1: Green Belt
 Policy ENV2: Natural Heritage
 Policy ENV4: The Water Environment
 Policy ENV5: Air Quality
 Policy P2: Housing Land Supply
 Policy I1: Connecting Places
 Policy I5: Flooding and Drainage

New Development Supplementary Guidance

Green Belt
 Housing in the Green Belt
 Natural Heritage
 The Water Environment
 Air Quality
 Contaminated Land
 Places Development Criteria
 Connecting Places
 Flooding and Drainage

Material considerations

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

An update to the HLSSG 2015 (i.e. Renfrewshire's Housing Land Supply Supplementary Guidance (Update) 2017) was approved for consultation by the Planning and Property Policy Board on the 14th March 2017. The update identifies the shortfall having reduced from 755 units to 230 private sector units. There is no change to the detailed assessment framework, criteria or considerations in the guidance.

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

Publicity

The application was advertised in the Paisley and Renfrewshire Gazette on the 21st December 2016, with a deadline for representations to be received of 20th February 2017.

Objections/Representations

One thousand, three hundred and sixty letters of representation have been received, all of which object to the proposed development. The points of objection can be summarised as follows:

- (1) The proposal is contrary to the Local Development Plan green belt policy;
- (2) The proposal will have a detrimental visual impact;
- (3) Traffic, access, congestion and road safety concerns;
- (4) There is insufficient capacity in the local primary school and medical centre;
- (5) There is insufficient infrastructure capacity in terms of sewage, drainage, electricity and water supply network;
- (6) Housing shortfall should not be used as justification;
- (7) Lochwinnoch has absorbed its fair share of new housing development in recent years, and does not need any more;
- (8) The local community are against the development;
- (9) The proposal will set an undesirable precedent for further development in the green belt;
- (10) The proposal would have a detrimental impact on wildlife, habitats and ecology within the site and nearby SSSI and SINCS;
- (11) The proposed development will make the village less attractive and deter tourism;
- (12) The proposal would have a detrimental impact on car parking at the train station and in the village centre which is already over capacity;
- (13) The proposal would create noise, disturbance, vibration and air pollution;
- (14) The proposal would result in a loss of privacy;
- (15) The proposal would have a detrimental impact on the character and setting of the village;
- (16) Priority should be given to developing brownfield sites instead of further greenfield sites;
- (17) The proposal would result in light pollution;
- (18) The proposal would have a detrimental impact on water quality and pollution risk at Castle Semple;
- (19) The Pre-application Consultation Report does not provide an accurate representation of the consultation event;
- (20) The proposal would have a detrimental impact on views, including into and through the Clyde Muirshiel Regional Park;
- (21) The site is at risk from flooding;
- (22) The proposal would have an adverse impact on setting of built heritage assets including buried archaeology;
- (23) The proposal would have a detrimental impact on the nearby 'Semple Trail';
- (24) There would be a loss of open space which is of high amenity and recreational value;
- (25) Site is not served by sufficient public transport or pedestrian links;
- (26) The proposed houses are unlikely to be of the 'affordable' type, and would not meet the real housing needs within the locality;
- (27) A similar proposal for residential development on the site has previously been refused;
- (28) There are inaccuracies within the assessments carried out;
- (29) Those living in the development will be car dependant, and this will increase pollution;
- (30) The applicants have no experience of residential house building in Scotland, and have no interest in the local community or heritage;

- (31) The proposal would have a detrimental impact on property values;
- (32) The proposal is contrary to Scottish Planning Policy;
- (33) The proposal is not in keeping with character of surrounding properties;
- (34) The development of the site will not benefit the local economy.

It is noted that the applicant has issued a rebuttal to the objection points raised.

Consultations

Director of Community Resources (Head of Roads - Design) - Flood Risk Assessment is acceptable. Drainage Impact Assessment requires to be finalised to a level of outline design to support the application.

Director of Community Resources (Head of Roads - Traffic) - Conditions are recommended regarding detailed information required in respect the internal layout, parking provision, and the formation of an additional minor access to Johnshill.

Director of Community Resources (Environmental Services) - No objection subject to conditions in respect of contaminated land.

The Director of Education and Leisure - Has advised that, whilst there is currently available capacity within schools in the catchment area of the site, the development, if approved, would result in Lochwinnoch Primary School exceeding 90% capacity.

West of Scotland Archaeology Service - Recommends that a condition should be attached which requires the developer to secure the implementation of a programme of archaeological works in accordance with a written scheme of investigation.

West of Scotland Water - No response at time of writing.

Lochwinnoch Community Council - Object to the development on the following grounds:

- Previous proposal for residential development on the site was refused, with appeal subsequently dismissed. The previous reasons for refusal apply to this proposal;
- Proposal is contrary to policy ENV1, ENV2 and ENV3 within the Local Development Plan;
- Proposal is contrary to the Strategic Development Plan;
- The density of development on the site (circa 100 units) is not in keeping with the surrounding area;
- Traffic, access and congestion;
- Detrimental impact on visual amenity, landscape and the skyline;
- Detrimental impact on wildlife and protected species;
- Proposal would undermine Lochwinnoch's 'village' status;
- The development is speculative, and is of no benefit to the community;
- No mitigation has been offered;
- Proposal would be out of keeping with the character of Lochwinnoch;
- Approval would lead to further, cumulative, coarse encroachment into the green belt;
- Drainage infrastructure is not sufficient;
- Surface water drainage will exacerbate existing flooding issues;
- Insufficient public transport to serve the site, and existing train station car park is at capacity;
- Proposal will not integrate with its surroundings with respect to layout and built form;
- Infrastructure upgrades required to accommodate development are cost prohibitive.

The Community Council have also submitted a document in response to the Planning Statement prepared by the applicant. The response seeks to challenge the statements made in the Planning Statement with respect to housing land requirement, the public exhibition, impact on character of Lochwinnoch, public transport, traffic, pre-application engagement and the Development Plan.

Kilbarchan Community Council - Object to the development on the following grounds:

- Encroachment on the green belt;
- Detrimental impact on visual and landscape amenity;
- Additional traffic generated by the development will pass through Kilbarchan to access the A737.

Summary of Main Issues:

Transport Assessment - Sets out the general transport planning policy context, before assessing site specific issues such as existing transport links, the development proposals, development trip generation and distribution, and assessment of the development impact. The applicant's assessment concludes that predicted traffic from the proposed development can be accommodated on the surrounding road network, and that the proposed development will integrate well with the existing transport network in a sustainable manner. The applicant's assessment recommends that there are no transport related issues preventing the award of planning permission.

Pre-application Consultation Report - Provides details of the public consultation activity undertaken, and the feedback received. A public exhibition was held on Wednesday 7th September 2016, with just over 400 people in attendance. The applicant's report states that feedback was generally positive, however concerns were raised over infrastructure, development of a green belt site, impact on wildlife, and affordable housing.

Preliminary Environmental Assessment Report - Outlines the regulatory context, historical land uses, the proposed development, environmental setting, a conceptual site model and recommendations for invasive investigation. The applicant's report concludes that contamination samples should be obtained in conjunction with a geotechnical investigation to confirm presence/absence of contamination. This should also include gas monitoring. However, the report notes that there is a very low risk potential for contamination to be present given historical and current land uses. The southern extremity of the site is noted as being at risk to surface flooding. The site lies outwith a Radon affected area, and is at low risk of being impacted by historical mineral extraction.

Drainage Strategy Plan and Flood Risk Assessment - Provides information on the existing site, the proposed development, the management of surface water and a flood risk assessment. The surface water strategy states that drainage from the site will incorporate full SUDS measures to control discharge, and that attenuation will be provided to limit the peak surface water discharge rate. It is anticipated that foul water will be discharged to the existing combined sewerage network in Johnshill. The Flood Risk Assessment confirms that the site is at low risk of flooding from fluvial, tidal, groundwater and pluvial sources.

Tree Survey and Constraints Report - Provides information on the tree population within the site, development constraints and opportunities, and statutory protection and guidance. Tree coverage across the site is low, with 22 individual trees, 8 groups of trees, 1 woodland compartment and 5 hedges recorded within influencing distance of the site. The applicant's report recommends that additional management of the trees may be required in response to a land use change on the site, and that an Arboricultural Impact Assessment will be required in support of a reserved matters application.

Landscape Appraisal - Provides a baseline review of designations, landscape and visual amenity before providing suggestions as to how the site could be developed to reduce the impact of the development on the landscape. Surrounding landscape designations include the Green Belt, Clyde Muirshiel Regional Park and Castle Semple Country Park, and the site is stated to fall within a 'Broad Valley Lowland' landscape character area. It is advised that the appraisal should be used to inform the subsequent layout of the site, and the applicant's suggestions for landscape mitigation include setting the development within a framework of open space, woodland and hedge planting.

Ecological Assessment - States that the site comprises a simple mix of habitat types dominated by semi-improved grassland with a significant area of marshy grassland and swamp habitat in the south of the site. It is recommended that as much of the marsh and swamp wetland habitat should be preserved, while hedgerows and trees should be retained where possible and supplemented by

additional planting. Further recommendations are also made in respect of invasive species, and the safeguarding of protected species including badgers, bats, birds, otters, water voles and reptiles.

Planning Statement - Sets out the legislative context, pre-application engagement undertaken, the development plan policies and the Housing Land Supply Supplementary Guidance 2015. The applicant's statement concludes that the proposed development is compliant with the provisions and principles of planning policy at national, strategic and local level, and the tests set out within the Housing Land Supply Supplementary Guidance 2015.

Appropriate Assessment - N/A

Planning Obligation Summary - No discussions have taken place between Renfrewshire Council and the applicant with respect to any planning obligations. However the applicant has provided a draft Section 75 agreement which states that the applicant is willing to enter into an agreement with the Council in respect of the following matters: 15% of the residential units to be constructed shall be Affordable Housing Units, an education contribution shall be made (the exact amount to be agreed in writing with the Council), and the establishment of a nature reserve.

Scottish Ministers Direction - N/A

Assessment

Section 25 of the Town and Country Planning (Scotland) Act 1997, requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case, the Development Plan comprises the Approved Glasgow and Clyde Valley Strategic Development Plan (GCVSDP) 2012 and the Adopted Renfrewshire Local Development Plan 2014 and associated New Development Supplementary Guidance, including the Housing Land Supply Supplementary Guidance 2015. The proposal also requires to be assessed taking account of Scottish Planning Policy and Clydeplan's Strategic Development Plan Proposed Plan 2016. In addition, the comments of consultees and the issues raised through representations are material considerations in the assessment of the application.

It is noted that two previous applications for residential development on the site were refused, with the subsequent appeal also dismissed. While the previous reasons for refusal may still be relevant, assessment of the application on its own merits and against the provisions of the currently adopted development plan and associated planning policy is required. The determining issues in this case are whether there is a need for this site to be developed for housing in the short term; the ability of the proposed development to meet this need; and whether the benefits of doing so would justify the use of green belt land and the effects on the surrounding area having regard to the development plan and other material considerations.

Scottish Planning Policy

Scottish Planning Policy (SPP) sets out national planning policies which reflect Scottish Ministers' priorities for the operation of the planning system and for the development and use of land. SPP aims to support sustainable development and the creation of high quality places. It sets out two overarching policy principles namely a presumption in favour of development that contributes to sustainable development; and, placemaking which seeks the creation of high quality places. It considers that the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place. It is not to allow development at any cost.

The presumption in favour of sustainable development does not change the statutory status of the development plan for decision making. For proposals that do not accord with development plans, the primacy of the plan is maintained. The presumption in favour of development that contributes to sustainable development is a material consideration.

In this instance the proposed development comprises a significant housing development on green belt land on the north eastern edge of Lochwinnoch that has no defensible green belt boundary. There are few opportunities for connection and integration with the existing village, and there are limited public transport services in close proximity to the site. Significant infrastructure investment would also be

required to successfully deliver homes at this location. It is not therefore considered that the proposal comprises sustainable development.

In relation to placemaking, development of the site would be backland in nature as the site is located to the rear of existing dwellings and does not benefit from a street frontage. Integration with the existing village would therefore be challenging. Poor connectivity with the existing village would present challenges with regard to the creation of a high quality place. In this regard, development on the site is considered to constitute an unsympathetic 'add-on' as opposed to the planned growth of Lochwinnoch (i.e. the release of green belt sites through the LDP process), or the creation of a successful place.

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

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

The 2017 update to the HLSSG, which is currently out to public consultation, contains the same detailed assessment framework and considerations as set out in the 2015 HLSSG. On this basis, the application site is also not considered to meet the requirements of the updated 2017 HLSSG.

SPP states that where a plan is under review it may be appropriate to consider whether granting planning permission would prejudice the emerging plan. In this respect it is considered that the proposed development would be so significant to the village of Lochwinnoch that it would have an adverse impact on the deliverability of more appropriate sites to serve housing need and demand for the local community. It is therefore considered that the granting of planning permission would undermine the plan making process and be premature in respect of appropriate housing site selection through the emerging local development plan.

Glasgow and the Clyde Valley Strategic Development Plan 2012

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

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

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

Climate Change - Minimising the Development footprint of the city-region/minimising the carbon footprint of the city- region/mitigating greenhouse gas emissions - The development of the site, given its size and location in the green belt, will not contribute towards the aims of minimising the carbon footprint of the city region. Renfrewshire Council accepts that additional sites are required to facilitate the development of new homes to meet identified need and that there may be a requirement for development of green belt land. However development of the application site, given its size, and location in respect of public transport links, is not considered to constitute sustainable development.

Low Carbon Economy - Supporting sustainable economic competitiveness/supporting key economic sectors and new environmental technology sectors/supporting the farming and rural economy - Although it is widely accepted that the housebuilding industry makes a significant contribution to the Scottish economy, this is not dependant on the development of the application site. The application site comprises an area of open grassland, and falls within Class 3.1 of the Land Capability for Agricultural classification (land capable of supporting arable agriculture). It is not considered that the proposed development will support economic competitiveness, key economic sectors or the farming and rural economy.

Sustainable Transport - Supporting sustainable access and active travel/providing appropriate public transport access/supporting future public transport services - The site is considered to be well located for access to active travel routes, with the 'Semple Trail' bordering the site to the north, and National Cycle Network 7 to the south. Access to public transport is summarised in the accompanying Transport Assessment. The assessment states that the site is within a one minute walk of a bus stop located on Johnshill, and on this basis bus use is convenient. However scheduled bus routes along Johnshill are infrequent (service every hour on weekdays) and unlikely to prove attractive for the majority of journeys. Lochwinnoch Station is 2km from the site. It is not considered that the site provides appropriate access to sustainable public transport links, and will likely increase the number of vehicle journeys undertaken in the local area. It is noted that the Transport Assessment advises that the local road network can accommodate these additional journeys, and the Head of Roads has not offered any objection to the application on this basis.

Green Network - Developing green infrastructure/supporting green belt objectives/ supporting biodiversity networks and designations - Paragraph 4.48 of the Approved SDP and Strategy Support Measure 8 'Green Infrastructure: an economic necessity' establishes that the green belt is central to the sustainable planning of the city-region, that it is an important strategic tool and has a significant role to play in achieving key environmental objectives by directing planned growth to the most appropriate locations, supporting regeneration, creating and safeguarding identity through place-setting and protecting the separation between communities. The application site comprises open grassland on the edge of Lochwinnoch, and occupies a prominent location in the landscape especially with regard to long distance views of the village. It is considered to contribute to the setting of the village, and adds to the local landscape character. Development on the site would breach the established settlement boundary, and have a detrimental impact on the setting of the village as a result. Lack of connectivity with the village, and the potential detrimental impact on its landscape setting, also make it difficult to envisage the development making a positive contribution to the overall sense of place. The site is not considered to benefit from a defensible green belt boundary, and an undesirable precedent could be set for further encroachment into the green belt. It is not considered that the development constitutes the direction of planned growth to appropriate locations, or regeneration as the site has not previously been developed. The development of this site does not therefore support the green belt objectives of maintaining the identity of settlements and protecting and enhancing their landscape setting.

Water Environment - Managing flood-risk/improving and safeguarding water quality - The Director of Community Resources has advised that the Flood Risk Assessment is acceptable. However it is noted

that the Drainage Impact Assessment needs to be finalised to a level of outline design in order to support the application. It is not evident that there will be no unacceptable impacts in this regard.

Network of Centres - Respecting the scale of the centres/Supporting the network of centres/Keeping the impact on the City Centre, including cumulative impact, to an acceptable level - The application is for residential development and it is not therefore considered that this part of the assessment criteria is directly relevant.

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

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

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

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

The application site has not been identified as a housing development site through the preparation and adoption of the Local Development Plan, or as one of the additional housing sites identified by the Reporter following the Examination of the Local Development Plan. It is noted that the site was rejected during the 2015 Suggestions for Land Use Change Exercise on the basis that it would be unlikely to add to the overall place of Lochwinnoch, and is unlikely to be considered as effective or deliverable in the lifetime of the LDP. The application site has been assessed against the criteria of Diagram 4 but fails to satisfy the set tests. It is considered that the proposal does not contribute to sustainable development, nor accord with the Vision and Spatial Development Strategy of the Approved SDP.

Proposed Strategic Development Plan 2016(SDP)

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

The Proposed SDP sets out a Spatial Development Strategy which supports a presumption in favour of sustainable development that contributes to economic growth. It acknowledges the city region's legacy of development and infrastructure and recognises that maximising the benefit of those resources is fundamental to ensuring the long term success of the city region. Through Policy 1 'Placemaking', it seeks to embed the creation of high quality places firmly as part of its Vision and Spatial Strategy.

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

The Proposed SDP 2016 advocates a consistent approach to the consideration of development proposals across the city region and considers that proposals which are in locations or at a scale or of a nature not identified in the SDP could undermine the Vision and Spatial Development Strategy. To assist in the development management process Section 10 of the Plan 'Implementing the Plan and Development Management' sets out 'thresholds for strategic scales of development ', within Schedule 14. With regard to Greenfield Housing Schedule 14 considers that 10 or more units outwith the Community Growth Areas or sites outwith those identified in LDP's are considered to be strategic. Given that the proposal comprises a housing development where an indicative number of 100 dwellings is proposed on a site located within the Green Belt designated through the Adopted LDP, it is considered to fall within the definition of strategic scale of development.

The Proposed SDP 2016 states that Diagram 11: 'Assessment of Development Proposals' should be used by local authorities when assessing strategic scale development proposals or other proposals that may impact on the Plan Strategy. This Diagram will determine whether strategic scale development proposals comply with the policies, schedules and diagrams of the SDP, and Box 1 sets out the considerations relevant to each development type which will ascertain whether it supports the Vision, Spatial Development Strategy and Placemaking Policy. When the proposal is assessed against the relevant policies and schedules the following conclusions can be made.

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

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

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

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

Creating and safeguarding identity through place-setting and protecting the separation between communities/landscape setting and identity of settlements - The site occupies a prominent location on the edge of Lochwinnoch, and is visible from a wide area. It is considered to contribute to the setting of the village in this regard. Development on the site would breach the defined settlement boundary, and would have a detrimental impact on the setting and identity of the village. The application site also does not benefit from a defensible green belt boundary which again may set an undesirable precedent for further encroachment into the green belt. The site is also considered to suffer from poor connectivity with the village itself, and is likely to appear as backland development. Integration between the development and the existing village would therefore be limited as a result of these factors, and it is difficult to envisage the development making a positive contribution to the overall sense of place or the landscape setting of the village.

Protecting open space and sustainable access and opportunities for countryside recreation - The development will result in the loss of open grassland which makes a positive contribution to the setting of the village. However it is not envisaged that the development will have a detrimental impact on existing sustainable access routes.

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

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

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

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

Policy 16 'Improving the Water Quality Environment and Managing Flood Risk and Drainage'. This policy seeks to support the Vision and Spatial Development Strategy and to achieve the objectives set out in paragraph 8.28 which include securing improvements to water and drainage capacity and reducing flood risk. The Director of Community Resources is satisfied that the Flood Risk Assessment submitted in support of the application is sufficient at this stage, although the Drainage Impact Assessment requires to be finalised to a level of outline design to support the application and to confirm that there would be no unacceptable impacts.

Policy 18 'Strategic Walking and Cycling Network' requires that development proposals should maintain and enhance the strategic walking and cycling network. It is not envisaged that the application proposal will have a detrimental impact on the strategic walking and cycling network. Feasibility of direct connection between the site and the strategic network has not been established.

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

The proposal will not make a significant contribution to sustainable development either through modal shift or a contribution to carbon reduction;

The proposal will not provide a significant economic benefit including the need to accommodate inward investment that would otherwise be lost to the city region;

The proposal would not respond to economic issues, challenges or opportunities, and will not lead to the creation of a significant number of net additional permanent jobs;

There is no specific locational need for the proposal;

The proposal will have a detrimental impact on the landscape setting of Lochwinnoch given the loss of open countryside associated with the development. However it is noted that the applicant has included the creation of a nature reserve in the draft planning obligation with regard to the wetland habitat to the south of the site, and this will help protect the natural heritage assets within the site.

The proposal would not improve health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation, which do not already exist in the area.

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

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

Adopted Renfrewshire Local Development Plan 2014

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

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

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

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

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

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

The proposal demonstrates outstanding quality of design; The application is in principle only and therefore these details would require to be assessed through the submission of further planning applications.

The proposal integrates with, complements and enhances the established character of the area and has no significant impact on the landscape character; It has been stated above that the proposed development is likely to have a detrimental impact on the landscape character of the area given the visibility of the site, and the contribution it makes to the setting of Lochwinnoch. The application has been submitted with a Landscape Appraisal which includes several recommendations as to how this impact could be mitigated. These recommendations focus on additional woodland planting to the south and north of the site, and a framework of open space, tree and hedge planting within the development layout itself. While planting of this nature may screen the development, it would also alter the character of the area in itself and would be detrimental to the setting of the village and the established character of the area. Additional planting would also not create a defensible green belt boundary for the site.

The proposal does not comply with the criteria as listed in the Supplementary Guidance, and is therefore considered to be contrary to the provisions of Policy ENV1.

Policy P2 'Housing Land Supply' states that the Council will maintain a 5 year supply of effective housing land at all times and prepare Supplementary Guidance including a framework to guide the release of additional housing land where a 5 year supply of effective housing land is not being

maintained. It is accepted that there is a potential shortfall in the supply of effective housing land and the Housing Land Supply Supplementary Guidance was approved in 2015 (and the HLSSG 2017 review is currently out for public consultation).

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

The site is shown to be effective and can be delivered to address the identified shortfall - The applicant asserts in their supporting documentation that housing on the site can be delivered within the five year effective land supply period as detailed in the 2015 Housing Land Supply Supplementary Guidance (development would therefore be built out by 2019). However it should be noted that the 2015 call for sites review stated that the site is unlikely to be considered as effective or deliverable in the lifetime of the Local Development Plan (2014 to 2019) as significant preliminary infrastructure work would be required.

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

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

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

The Housing Land Supply Supplementary Guidance 2015 (HLSSG) provides a framework for release of further housing land against which residential planning applications are to be assessed. The HLSSG sets out the circumstances within which the additional release of land for housing will be supported but demands that those sites meet the "main" and "other" considerations.

For the reasons set out earlier in this report, the proposals are not considered to satisfy the first three 'Main Considerations' set out in the HLSSG with reference to (1) Scottish Planning Policy - Sustainability and Placemaking Principles; (2) compliance with the Glasgow and the Clyde Valley Strategic Development Plan - Spatial Development Strategy, sustainable location assessment (Diagram 4) or Strategy Support Measure 10; (3) nor the adopted Renfrewshire Local Development Plan - including the Spatial Strategy or Policy P2 - Housing Land Supply.

Similarly, the proposals are not considered to have satisfied all of the HLSSG 2015 'Other Considerations' and in particular with reference to failing to create or be contained within robust defensible boundaries, setting a precedent for further expansion, by having a significant effect on the character and amenity of the surrounding area and the potential to impact on the prior provision of infrastructure required by existing housing land allocations which are either not yet consented or are committed. Furthermore, the proposals are likely to have a significant effect on the character and amenity of the surrounding area.

It is concluded therefore that the application proposal does not comply with the framework for release as required by the HLSSG 2015.

Policy ENV2 and the associated New Development Supplementary Guidance 'Delivering the Environment Strategy - Natural Heritage' states that developments must not have an adverse impact on the integrity of sites protected for their natural conservation interest. It is not envisaged that the development will have a detrimental impact on either the SSSI or the SINC which are in close proximity

to the site. The Ecological Assessment submitted as part of the application also does not identify any specific impact on protected species (subject to recommendations regarding the development of the site). In addition, the draft planning obligation states that the applicant will establish a nature reserve on the site to reinforce a wetland habitat in the south of the site which is of particular ecological interest. In view of the above, the development is not considered to raise any issues with regard to Policy ENV2.

Policy ENV4 and the associated New Development Supplementary Guidance 'Delivering the Environment Strategy - The Water Environment' states that there will be support for proposals which encourage protection of the existing water environment as well as improvement to the control and management of water. It is not envisaged that the development will significantly compromise the water environment in terms of its ecological status, or significantly impact on water quality in adjacent watercourses. The development is not considered to raise any issues with regard to Policy ENV4

Policy ENV5 and the associated New Development Supplementary Guidance 'Delivering the Environment Strategy - Air Quality' states that the Council will seek to ensure that development proposals shall not individually or cumulatively have an adverse impact on air quality. The Director of Community Resources has not raised the issue of air quality in their consultation response. The development is therefore considered to be acceptable with regard to air quality.

The New Development Supplementary Guidance 'Delivering the Environment Strategy - Contaminated Land' requires sufficient information to be submitted to establish whether contamination is present at an application site so that appropriate conditions can be attached to ensure that the necessary remediation action will be undertaken to prevent unacceptable risks to human health or the environment. In this regard the Director of Community Resources (Environmental Services) has requested the submission of a site investigation report and remediation method statement for the site by way of a planning condition should consent be given.

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

Regarding the remainder of the Places Development Criteria, it is not considered that surrounding land uses will have a significant adverse effect on the proposed development. The development will result in the loss of open countryside which contributes to the landscape setting of Lochwinnoch, and it has been established above that this will have a detrimental impact on the setting of the village and the landscape character of the area. The retention of existing ecological features, and the formation of a Nature Reserve as detailed in the planning obligation, is not considered to compensate for the loss of the open countryside.

The Director of Education and Leisure has advised that whilst there is currently available capacity within schools in the catchment area of the site, the development, if approved, would result in Lochwinnoch Primary School exceeding 90% capacity. As a consequence of reaching this capacity it is likely that operational or infrastructure improvements at Lochwinnoch Primary School would be required. Future housing developments may therefore be required to provide financial contributions in order to mitigate education capacity pressures.

Policy I1 and the associated New Development Supplementary Guidance 'Delivering the Infrastructure Strategy - Connecting Places' advises that access to walking, cycling and public transport networks is a key consideration for investment locations within Renfrewshire. It has been outlined above that the development will likely increase the number of vehicle journeys through Lochwinnoch as the site is not in a sustainable location with regard to public transport links. Those residing in the development would be car dependent given the proximity of the site to the train station, and the infrequency of bus services along Johnshill. While there is scope for good access from the site to walking and cycling networks, it is likely that this would be for recreation rather than getting to and from employment, education,

residential, retail and other land uses. While traffic from the site can be accommodated on the local road network, it is not considered that the site is suitable with regard to supporting sustainable travel.

Policy I5, 'Flooding and Drainage' considers that new development must not have an impact on existing drainage infrastructure or increase the risk of flooding elsewhere and requires to be assessed against the New Development Supplementary Guidance 'Delivering the Infrastructure Strategy - Flooding and Drainage' which sets out a number of criteria which require to be considered. These generally require minimum standards to reduce the risk of flooding in new developments and to ensure that the risk of flooding is fully considered in the assessment of new development proposals. In this regard, the Director of Community Resources is satisfied with the Flood Risk Assessment. However the Drainage Impact Assessment requires to be finalised to a level of outline design to support the application and it has not been demonstrated that there will be no unacceptable impacts.

In view of the above assessment, development on the site is considered to be unacceptable and would not comply with the Spatial Development Strategy of the Approved Strategic Development Plan 2012, Proposed Strategic Development Plan 2016 and Adopted Local Development Plan 2014 and associated New Development Supplementary Guidance. Nor does it represent an exception which can be justified through the Housing Land Supply Supplementary Guidance 2015.

In response to the material points of objection raised in the letters of representation which have not been addressed in the above assessment, it may be commented that as the application is in principle only, no details have been provided with respect to layout, house types or design. A full assessment of the impact of the development on the amenity of existing residential properties, including privacy, cannot therefore be undertaken. Such issues would usually be addressed at the approval of matters stage. However in this instance, and for the reasons stated above, it is not considered that residential development on the site is acceptable in principle.

Conclusion.

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

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

RECOMMENDATION

Refuse

Reasons

- 1 The proposal does not accord with the Spatial Development Strategy and related Spatial Frameworks of the approved Glasgow and the Clyde Valley Strategic Development Plan and Clydeplan's Strategic Development Plan Proposed Plan 2016 in terms of its location and development compatibility and therefore fails to support the Spatial Vision of the Plan.

- 2 The proposal is contrary to Policy ENV 1 of the Adopted Renfrewshire Local Development Plan in that it would result in development within the designated Green Belt without appropriate justification and due to its location and scale would not be commensurate with the aims of maintaining the identity of settlements and protecting and enhancing the landscape setting of an area.
- 3 The proposal is contrary to the Adopted Renfrewshire Local Development Plan New Development Supplementary Guidance - Delivering the Environment Strategy as it does not require a specific green belt location and does not maintain or support an established activity which is suitable in the green belt. The proposal would thereby introduce an inappropriate form of development into the Green Belt, result in an unacceptable erosion of the Green Belt and result in an adverse and detrimental impact on its character.
- 4 The proposal is contrary to Policy P2 of the Adopted Renfrewshire Local Development Plan and the Housing Land Supply Supplementary Guidance 2015, and due to its scale and location, the proposed development would undermine the Spatial Strategy of the Adopted Renfrewshire Local Development Plan. The proposal would thereby introduce an inappropriate form of development into the Green Belt, result in an unacceptable erosion of the Green Belt and result in an adverse and detrimental impact on its character.
- 5 The proposal is considered to be premature in respect of the emerging local development plan and would therefore undermine the plan making process.

Fraser Carlin
Head of Planning and Housing

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



Renfrewshire
Council

16/0806/PP

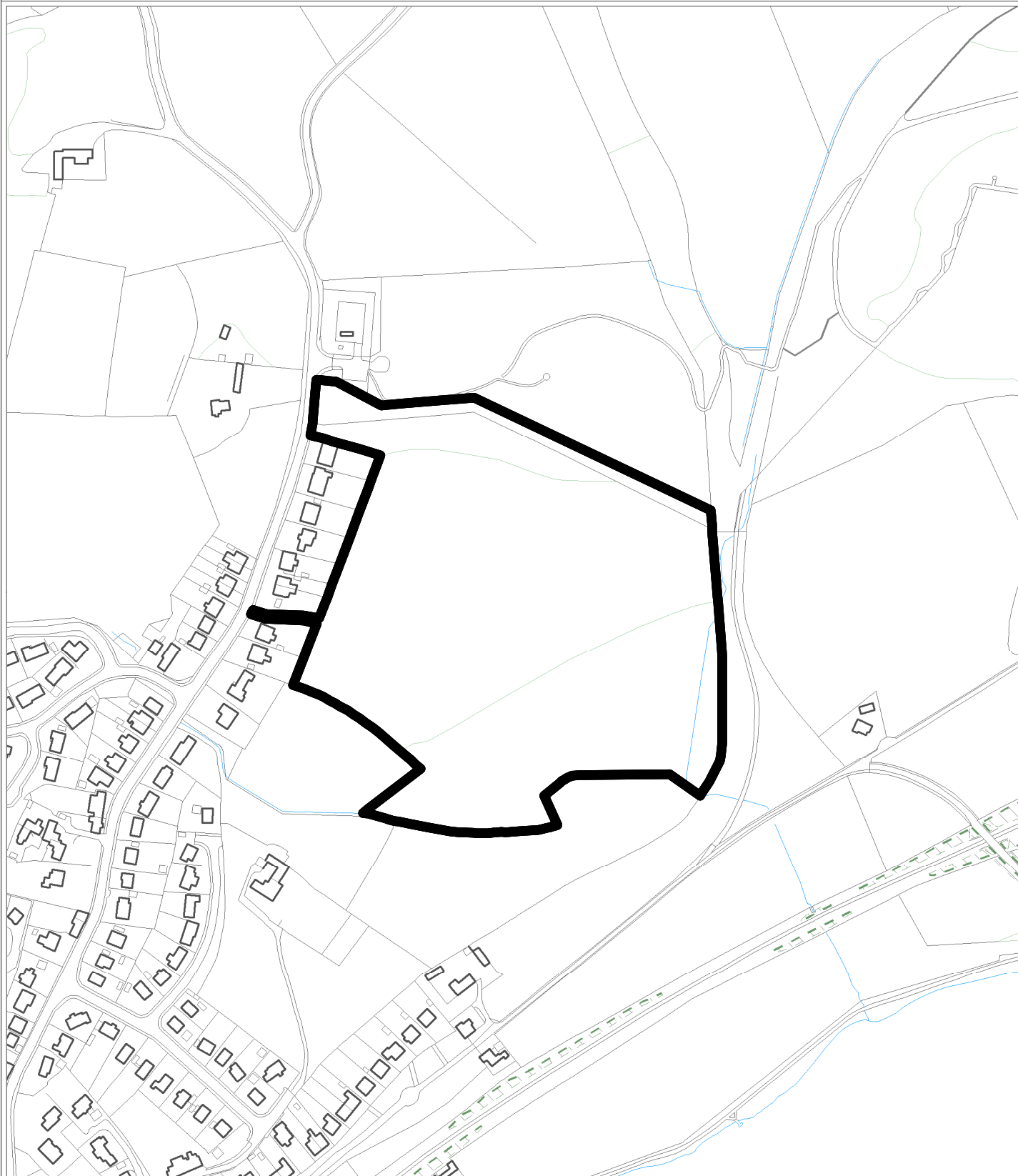
Site on Northern boundary of Beech Burn,
Johnshill, Lochwinnoch



1:4,000

User: ptcameronr1

Date: 07/02/2017



Notes:
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