

RENFREWSHIRE COUNCIL

Application No: 16/0594/PP

DEVELOPMENT AND HOUSING SERVICES  
RECOMMENDATION ON PLANNING APPLICATION

Regd: 26/08/2016

**Applicant**

**Agent**

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**Nature of proposals:**

Erection of residential development (in principle).

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**Site:**

Site between Dunvegan Avenue and Gleniffer House, Glenpatrick Road, Elderslie, Johnstone

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**Application for:**

Planning Permission in Principle

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**Introduction**

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

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

The Pre Determination Hearing took place at the Planning and Property Policy Board on 08 November 2016.

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

**Description**

Planning permission is sought, in principle, for the erection of a residential development on an area of agricultural land located within the greenbelt to the south of Elderslie. The application site extends to approximately 14 hectares and is located to the south of land accessed from Abbey Road, Elderslie, at its boundary with the green belt. This adjoining area of land is currently under consideration by the Scottish Government's Planning and Environmental Appeals Division (DPEA) on appeal against refusal of planning permission for a residential development. To the north east and north west lies residential development and surrounding the site on all other boundaries is green belt land.

As the application is in principle only, no details of the proposed residential layout have been provided. Within the applicant's Design and Access Statement, accompanying the application, however, an indicative road layout, open space and landscaping provision are demonstrated. This document also states that the development could accommodate 200 units, with access arrangements proposed from Abbey Road, (through the development, currently under consideration by the DPEA) and from two additional openings off Glenpatrick Road.

## **History**

15/0434/NO - Site between Dunvegan Avenue and Gleniffer House, Glenpatrick Road, Elderslie, Johnstone. Proposal of Application Notice accepted June 2015.

## **Policy & Material Considerations**

### **Scottish Planning Policy**

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

### **Glasgow and the Clyde Valley Strategic Development Plan 2012**

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

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

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

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

### **Adopted Renfrewshire Local Development Plan 2014**

Policy ENV1: Green Belt  
 Policy P2: Housing Land Supply  
 Policy I5: Flooding and Drainage

### **New Development Supplementary Guidance**

Delivering the Environment Strategy: Green Belt; Housing in the Green Belt; Contaminated Land  
 Delivering the Places Strategy: Places Development Criteria  
 Delivering the Infrastructure Strategy: Flooding and Drainage and Infrastructure Development Criteria

### **Material considerations**

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

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

## **Publicity**

The application was advertised in the Paisley and Renfrewshire Gazette on 14 September 2016, with a deadline for representations to be received of 07 October 2016.

## **Objections/Representations**

One hundred and three letters of representation have been received (one in support of the development), the substance of which can be summarised as follows:-

1. The application should be rejected as the site is within the Green Belt and there are brownfield and gap sites available which could be developed.
2. Planning application 15/0470/PP (for the adjacent site) was refused on the grounds of increased traffic and the detrimental effects on road safety. The same or worse conditions would be generated by this larger development.
3. The proposal would result in a considerable increase in the risk of flooding to adjoining properties on Glenpatrick Road as the field acts as a floodplain in the winter months.
4. The development will overlook and overshadow properties on Glenpatrick Road resulting in a loss of privacy and a breach of human rights.
5. Local amenities will not cope with the increased demand on them that this development would bring, including schools, and there is concern whether children would be safe in the play park close to the development.
6. The land is well used farmland, also used for walking, with the proposals resulting in a loss of this type of available land. In addition, the Abbey Road field will be cut off making it useless and inaccessible.
7. Development of this land would result in a loss of views and reduction in value of property.
8. There are mine workings below the entire area which resulted in previous developers abandoning plans.
9. The proposals would have a significant impact on wildlife and trees and it is assumed an Environmental Risk Assessment has been carried out.
10. Development would create noise, disturbance and pollution due to construction works and traffic.
11. Granting permission will increase the likelihood of further development of this kind in the future at the expense of the green belt and would result in Elderslie losing its village feel with it becoming an extension of Johnstone.
12. Johnstone is already experiencing poor air quality, with this development increasing pollution.
13. Not aware of any consultation in relation to this development prior to submission of this application. In addition, it can only be assumed that the lack of information given to the local community about this proposal was a deliberate omission on the part of the Council and despite living within 20 metres of the application site boundary no neighbour notification has been received.
14. Weight associated with the volume of traffic using the site will cause structural damage to existing properties.
15. Residential development will help Elderslie and the community as a whole.

### **Consultations**

**The Director of Community Resources (Roads)** – Has raised a number of concerns which require to be addressed and recommends deferral on a decision being taken on the application at this time due to an incomplete Transport Assessment having been submitted.

**The Director of Community Resources (Environmental Services)** - No objections, subject to the submission of a site investigation report, remediation strategy/method statement and a verification report.

**The Director of Community Resources (Design Services)** - The Flood Risk Assessment is suitable and sufficient, with recommendations contained within to form the basis of any future full or Approval of

Matters Specified in Conditions (AMSC) application. In relation to the Drainage Report, incorrect information has been used to calculate site surface water runoff and storage, surface water flows to cater for climate change and urban creep.

**West of Scotland Archaeology Service** - No objections, subject to a condition requiring the implementation of a programme of archaeological works in accordance with a written scheme of investigation prior to the commencement of any development on site.

**The Coal Authority** - No objections subject to conditions requiring the submission of a scheme of intrusive investigations, identification of zones of influence for the mine entry and definition of 'no-build' zones; and a scheme of remedial works for the shallow coal workings.

**The Director of Education and Leisure** - Proposal would impact upon St Anthony's and Wallace Primary Schools and if approved would result in an increase in pupil roll beyond operational capacity to the detriment of education provision.

**SEPA** - Request that a planning condition be applied to any consent given, requiring the provision of appropriate flood management measures as recommended by the FRA. If the condition required cannot be imposed SEPA object to the granting of planning consent.

**Historic Environment Scotland** - No objections.

**Glasgow Airport Safeguarding** - No objections, subject to conditions requiring the submission of details of the location, height, form and materials of buildings and structures proposed and of soft and water landscaping works.

**Strathclyde Partnership Transport** - Suggest that a Sustainable Transport Strategy be a conditioned requirement of any planning consent given. Any consent should also be subject to a planning obligation, covering the delivery of the recommendations set out in the public transport strategy, with a legal agreement providing a funding mechanism to deliver the public transport strategy. Travel information packs should also be made available for each dwelling prior to occupation advising of travel options beyond the private car.

### ***Summary of Main Issues***

Environmental Statement - The application proposal was screened under the terms of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011, to determine the requirement for an Environmental Statement to be submitted with any future planning application. It was concluded that although the proposal falls within Schedule 2 of the Town and Country Planning (Environmental Impact Assessment)(Scotland) Regulations 2011, it is not likely that the proposed works would have a significant environmental impact which would require an Environmental Assessment to be carried out. It was concluded that no significant long term impacts on the environment were anticipated having regard to the characteristics of the development, the location of the development and the characteristics of the potential impact.

Design & Access Statement - The applicant's Design and Access Statement submitted provides a brief history to the site and its location including its landscape character and ecological context. The document also considers the proposals against the relevant planning policies and guidance, with regard to local amenities, access arrangements/provision and flood risk. In terms of design, the applicant has considered built form in conjunction with environmental integration and enhancement and includes a development framework.

Proposal of Application Consultation Report - The applicant submitted a proposal of application notice (15/0434/NO) to the Council on 09 June 2015. This required a Pre-application Consultation (PAC) process prior to the submission of a planning application. The PAC report provides an overview of all pre-application consultations which have been undertaken, including details of a pre-application consultation event held on 31 August 2015. The public consultation event was held at Elderslie Village Hall, with the local Community Council and local Members invited and the event open to all interested parties. The summary states that attendees expressed concern in relation to the principle of residential

development at this location within the green belt and the lack of infrastructure to support the development.

Planning Statement - The Planning Statement provided advises that the proposal is an effective site which has the potential to contribute to addressing Renfrewshire Council's Housing Land shortage in accordance with the relevant policies of the Strategic and Adopted Local Development Plans. The document further states that suitable infrastructure and amenities either exist or could be provided, with two new junctions onto Glenpatrick Road proposed to provide access to the site as well as access via the refused Abbey Road site to the north. Reference is also made to the creation of a defensible boundary to the south, negating the requirement for formal open space within the development itself (due to existing provisions and connections available to this). The document analysis states that the site could be substantially completed or completed by 2019, although the tabular supporting information allows for up to 110 of the 200 units to require until 2021 for completion.

Flood Risk Assessment - The applicant's Flood Risk Assessment undertakes a hydrological analysis to estimate design flows for an unnamed watercourse that flows through the site and the Old Patrick Water that flows north to the east of the site, which has been used to assess flood risk to the site. The findings indicated flooding near to the southern boundary of the site along the length of the unnamed stream. Flood management measures are also suggested as a result of these findings including:- no development to take place within the 200 year floodplain of the watercourse; the opening of a culvert in line with SEPA policy; finished floor levels of properties adjacent to flood risk areas to be set no lower than 600mm above predicted 200 year peak water level in the area; surface water runoff entering the site from higher ground to the north to be either captured and diverted to the unnamed stream or taken into the drainage system; and surface water runoff from the site to be attenuated to greenfield rates before being discharged to the unnamed stream. The site is not considered to be at risk from flooding from other sources.

Extended Phase 1 Habitat Survey - The applicant's Habitat Survey identifies that due to the location of a potential otter couch (day bed), a survey is recommended to confirm the presence of otter on site or if the species is using the site as a commuting habitat. In addition, an assessment on the presence of bats, reptiles and nesting birds is proposed.

Education Impact Report - The applicant has submitted an Education Impact Report which states that based on their research there will be no capacity problems at any of the catchment denominational primary, non-denominational secondary or denominational secondary schools as a direct result of the proposed development being approved and built. With regards to the non-denominational primary education position, it is considered that it may be appropriate to include the area of the proposed development within a revised catchment area for Auchenlodment Primary School to ensure that sufficient non-denominational primary places would be available for children arising from the proposed development.

Landscape and Visual Impact Assessment - The applicants state that adjacent urban areas to the north, east and south east of the proposed development would limit its visual influence. The rolling topography of much of the study area and extent of woodland cover would further limit visibility of the site from much of the east and western parts. From Gleniffer Braes, the applicant opines that the proposed development will locally be seen in the context of the existing settlement at Elderslie and Johnstone and within the wider context of urban development across the Clyde Valley. Other areas which have potential visibility of the site are those located in close proximity to the site boundary, including residential areas, adjoining areas of open farmland and areas of open and elevated ground along the northern parts of Windyhill. Potential significant effects are expected to be restricted to the immediate vicinity of the site and are likely to be localised to parts of the settlement edge of Elderslie and Johnstone as well as parts of the local road network at Auchenlodment Road and Glenpatrick / Mackiesmill Road. The design and layout of the proposed development as well as additional mitigation measures are proposed to contain the development and limit its effects upon the surrounding area. Although the development has the potential to result in localised and potentially significant effects on the Green Belt south of Elderslie, in light of the future housing requirements, the applicant considers that the development could contribute significantly to the integration of urban settlement within the wider green network at this location. In assessing effects on landscape character, no effects are considered to impact on Brookfield Urban Fringe Farmland due to distance and limited intervisibility.

The proposed development is located entirely within the Johnstone and Elderslie Urban Fringe LLCA and it is considered that impact would be moderate in nature. In terms of the Glenniffer Braes Rugged Farmland LLCA impact is considered to be low from the proposed development as with the Urban LLCA. On the Core Path John/10 impact is considered to be medium, low on Glenniffer Country Park and low on Windyhill (WIAT).

Engineering Assessment and Drainage Report - The applicant's Engineering Assessment provides a background to the site and its characteristics and identifies the requirement for ground levels to be regraded in order to accommodate the development proposed. Utilities and ground conditions are also considered.

Initial Geological & Mining Risk Assessment - The applicant's Initial Geological & Mining Risk Assessment concludes that there is potential for mining related instability at the surface across the site due to recorded shallow abandoned mine workings. Historical evidence also indicates the presence of at least two former mineshafts on the site and one other close to the site boundary. As the presence of these mineshafts represents potential development constraints, further measures are required to assess the instability associated with these features. A site investigation shall also be required to confirm the location and condition of an old quarry on the site.

Appropriate Assessment - N/A

Planning Obligation Summary - N/A

Scottish Ministers Direction - N/A

### **Assessment**

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

### **Scottish Planning Policy**

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

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

comprises a significant housing development on green belt land with no defensible green belt boundary. There is limited services and facilities to serve this new development along with a lack of necessary infrastructure to successfully deliver homes at this location. Therefore it is considered that the proposed development is not sustainable, nor will it enhance the existing settlement of Elderslie.

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

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

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

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

#### Glasgow and the Clyde Valley Strategic Development Plan 2012

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

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

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

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

*Low Carbon Economy - Supporting sustainable economic competitiveness/supporting key economic sectors and new environmental technology sectors/supporting the farming and rural economy -*

Although it is widely accepted that the housebuilding industry makes a significant contribution to the Scottish economy, this is not dependant on the development of the application site. The application site, although identified as primarily Class 4.2 (non-prime) under the McCauley Land Capability for Agriculture classification, is defined as being land capable of producing crops and could be utilised for farming purposes. Therefore the development of this site would neither support sustainable economic competitiveness, new environmental technology sectors nor farming and the rural economy.

*Sustainable Transport - Supporting sustainable access and active travel/providing appropriate public transport access/supporting future public transport services -* The application was accompanied by a Transport Assessment which the Director of Community Resources (Roads Traffic) has deemed to be incomplete. As such it has been recommended that the Planning Authority defer taking a decision on the application until a number of issues can be considered and possibly resolved. Given that the principle of the development does not accord with the strategic and local components of the development plan it has not been considered necessary or appropriate to invite the applicant to address or seek to resolve the technical concerns of the Director of Community Resources (Roads Traffic).

*Green Network - Developing green infrastructure/supporting green belt objectives/ supporting biodiversity networks and designations -* Paragraph 4.48 of the Approved SDP and Strategy Support Measure 8 'Green Infrastructure: an economic necessity' establishes that the green belt is central to the sustainable planning of the city-region, that it is an important strategic tool and has a significant role to play in achieving key environmental objectives by directing planned growth to the most appropriate locations, supporting regeneration, creating and safeguarding identity through place-setting and protecting the separation between communities. Although the application site is located on the edge of Elderslie in proximity to some areas of existing housing, it comprises a large natural agricultural site in a prominent green belt location, which adds to the local landscape character and setting of Elderslie. Additionally it has no obvious spatial connection to Elderslie, particularly given the development void to the north (currently the subject of appeal against refusal of planning approval for residential development) and lack of a defensible green belt boundary, given the indicative road/pedestrian linkage demonstrated within the applicant's supporting information to land to the south of the site. The present settlement edge is considered, in land use terms, as being acceptable in the manner in which it terminates the urban envelope along the northern boundary of the application site (subject to a suitable development being proposed at Abbey Road which accords with the relevant policies of the Adopted Local Development Plan and road safety objectives) and which could provide a more robust settlement edge. The application site is not considered to be an infill site as it is located to the south of the established settlement, which already acts as a defensible green belt boundary, and as such is set apart from the remainder of the built up area of Elderslie. The development of this site does not therefore support the green belt objectives of maintaining the identity of settlements and protecting and enhancing their landscape setting.

*Water Environment - Managing flood-risk/improving and safeguarding water quality -* The Director of Community Resources is satisfied that the Flood Risk Assessment provided is suitable to form the basis of any future full or AMSC application, however the Drainage Report provided has been based on incorrect data requirements for the purpose of calculating site water runoff and storage and surface water flows to cater for climate change and urban creep. This document would require amendment to allow further consideration in terms of impact on the site itself and surrounding area.

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

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

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



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

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

The application site has not been identified as a housing development site through the preparation and adoption of the Local Development Plan or as one of the additional housing sites identified by the Reporter following the Examination of the Local Development Plan. The application site has been assessed against the criteria of Diagram 4 but fails to satisfy the set tests. It is considered that the proposal does not contribute to sustainable development nor does it 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 26<sup>th</sup> May 2016 and represents the settled view of Clydeplan, the Strategic Development Planning Authority of which Renfrewshire is a constituent part and therefore it has to be considered in the assessment of this proposal.

The Proposed SDP 2016 sets out a Spatial Development Strategy which supports a presumption in favour of sustainable development that contributes to economic growth. It acknowledges the city region's legacy of development and infrastructure and recognises that maximising the benefit of those resources is fundamental to ensuring the long term success of the city region. Through Policy 1 'Placemaking', it seeks to embed the creation of high quality places firmly as part of its Vision and Spatial Strategy.

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

The Proposed SDP advocates a consistent approach to the consideration of development proposals across the city region and considers that proposals which are in locations or at a scale or of a nature not identified in the SDP could undermine the Vision and Spatial Development Strategy. To assist in the development management process Section 10 of the Plan 'Implementing the Plan and Development Management' sets out 'thresholds for strategic scales of development ', within Schedule

14. With regard to Greenfield Housing Schedule 14 considers that 10 or more units outwith the Community Growth Areas or sites outwith those identified in LDP's are considered to be strategic. Given that the proposal comprises a housing development where an indicative number of 200 dwellings is proposed on a site located within the Green Belt designated through the Adopted LDP, it is considered to fall within the definition of strategic scale of development.

The Proposed SDP states that Diagram 11: 'Assessment of Development Proposals' should to be used by local authorities when assessing strategic scale development proposals or other proposals that may impact on the Plan Strategy. This Diagram will determine whether strategic scale development proposals comply with the policies, schedules and diagrams of the SDP, and Box 1, sets out the

considerations relevant to each development type which will ascertain whether it supports the Vision, Spatial Development Strategy and Placemaking Policy. When the proposal is assessed against the relevant policies and schedules, the following conclusions can be made.

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

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

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

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

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

*Protecting open space and sustainable access and opportunities for countryside recreation* - the application does not propose any development over existing open space and will see an extension to the existing park, immediately to the south of the application site. The indicative Development Framework also aims to maximise connectivity through the proposed street and path network to connect the open space network and beyond to wider rural Elderslie, although full details have not been provided at this time due to the 'in principle' nature of the application.

*Maintaining the natural role on the environment* - the proposal is for a large housing development which will not maintain the natural role of the environment in this location but will impact on the setting of Elderslie 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 Elderslie, 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 an amended Drainage Report would be required to determine impact on the site and surrounding area in terms of the calculation of site water runoff and storage and surface water flows to cater for climate change and urban creep.

Policy 18 'Strategic Walking and Cycling Network' requires that development proposals should maintain and enhance the strategic walking and cycling network. The application proposal does not identify maintenance of the existing walking and cycling network, although supporting documentation advises that future detailed submissions shall include a series of pedestrian and cycle routes.

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

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

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

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

There is no specific locational need for the proposal;

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

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

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

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

#### Adopted Renfrewshire Local Development Plan 2014

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

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

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

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

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

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

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

*The proposal integrates with, complements and enhances the established character of the area and has no significant impact on the landscape character* - In this case the applicant has provided a Design and Access Statement (D&A), Planning Statement and Landscape and Visual Impact Assessment (LVIA) in justification of development at this location. The documentation states that the application site consists mainly of undulating farmland, with existing residential development providing containment to the north and east, whilst woodland cover and elevated landform limit the extent to which the proposed site is likely to be visible to the south and west. To address areas with potential visibility of the development it is proposed to retain and expand the existing woodlands on the site as part of the open space strategy, to define the southern and western edges of the settlement and to integrate the development when seen from longer distance views from elevated land to the south. In this regard, although the application is in principle, the indicative layout for the development suggests that the site could accommodate in the region of 200 houses which is not considered to be small scale in the context of the surrounding landscape and in relation to the existing settlement of Elderslie. Although the indicative layout illustrates a development set within landscaped buffers, the site is on a prominent edge of Elderslie with little containment on its boundaries which could be identified as an appropriate and defensible edge to the green belt. It is not considered therefore that the proposal integrates with, complements or enhances the established character of the area but would have a significant adverse impact.

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

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

maintained. It is accepted that there is a potential shortfall in the supply of effective housing land and the Housing Land Supply Supplementary Guidance was approved in 2015.

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

*The site is shown to be effective and can be delivered to address the identified shortfall* - The applicant has submitted a representative site delivery timetable which claims that 30 units could be completed by the end of 2018, 60 units by end of 2019, 60 units by end of 2020 and a final 50 units by the end of 2021. This timetable would appear to be achievable, demonstrating that the site can be delivered to

address the identified potential shortfall, although it contradicts the text within the applicant's supporting analysis which advises that the site could be delivered by 2019 in totality.

*It will not undermine the spatial strategy of the plan* – With regard to the criteria of the Spatial Strategy, it has been demonstrated above that the proposed development will not contribute positively to the character and appearance of Elderslie 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 Measure10; 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 'Other Considerations' and in particular with reference to failing to create or be contained within robust defensible boundaries, setting a precedent for further expansion, by having a significant effect on the character and amenity of the surrounding area and the potential to impact on the prior provision of infrastructure required by existing housing land allocations which are either not yet consented or are committed.

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

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

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

Policy I5, 'Flooding and Drainage' considers that new development must not have an impact on existing drainage infrastructure or increase the risk of flooding elsewhere and requires to be assessed

against the New Development SG which sets out a number of criteria which require to be considered. These generally require minimum standards to reduce the risk of flooding in new developments and to ensure that the risk of flooding is fully considered in the assessment of new development proposals.

In this regard, the Director of Community Resources requires the submission of a revised drainage report for the development to demonstrate that the site can be appropriately drained.

In relation to the Infrastructure Development Criteria the applicant's Transport Assessment is considered to be incomplete. In addition, the Director of Community Resources (Roads Traffic) has raised a number of concerns relating to access, visibility, the provision of footways, sustainable access arrangements and carriageway capacity.

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

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

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

Following consultation with the Director of Community Resources (Environmental Services) no objections have been raised in relation to the potential for impact on air quality or resultant pollution from the proposed development.

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

Due to the lack of supporting information submitted with the application in relation to mine workings, the Coal Authority initially objected to the proposal. A mining risk assessment was latterly submitted and in response, the Coal Authority recommended a suite of conditions requiring the submission of a scheme of intrusive investigations, identification of zones of influence for the mine entry and definition of 'no-build' zones; and a scheme of remedial works for the shallow coal workings. Until these matters have been fully addressed it remains inconclusive whether the applicant's aspirations in terms of their site delivery timetable to satisfy the HLSSG timescale requirements are deliverable.

In relation to pre-application consultation the applicant has complied with the relevant legislation for major applications, holding a public consultation event, which was advertised in the local press, allowing interested parties to attend and obtain further information in relation to the nature of the development, prior to submission of this application. With regard to neighbour notification, all notifiable neighbours within 20 metres of the application site boundary were notified of the development by the Council in accordance with statute.

In terms of the loss of views, values of property and impact from noise and disturbance during construction works, these concerns do not constitute material planning considerations in the assessment of the current proposal.

Any structural damage to existing properties as a result of any development approved would be a civil matter to be addressed by the developer and the affected party.

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

### **Recommendation and reasons for decision**

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

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

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### **RECOMMENDATION**

Refuse

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### **Conditions and Reasons**

- 1 The proposal does not accord with the Spatial Development Strategy and related Spatial Frameworks of the approved Glasgow and the Clyde Valley Strategic Development Plan and Clydeplan's Strategic Development Plan Proposed Plan 2016 in terms of its location and development compatibility and therefore fails to support the Spatial Vision of the Plan.
- 2 The proposal is contrary to Policy ENV 1 of the Adopted Renfrewshire Local Development Plan in that it would result in development within the designated Green Belt without appropriate justification and due to its location and scale would not be commensurate with the aims of maintaining the identity of settlements and protecting and enhancing the landscape setting of an area.
- 3 The proposal is contrary to the Adopted Renfrewshire Local Development Plan New Development Supplementary Guidance - Delivering the Environment Strategy as it does not require a specific green belt location and does not maintain or support an established activity which is suitable in the green belt. The proposal would thereby introduce an inappropriate form of development into the Green Belt, result in an unacceptable erosion of the Green Belt and result in an adverse and detrimental impact on its character.
- 4 The proposal is contrary to Policy P2 of the Adopted Renfrewshire Local Development Plan and the Housing Land Supply Supplementary Guidance 2015, and due to its scale and location, the proposed development would undermine the

Spatial Strategy of the Adopted Renfrewshire Local Development Plan. The proposal would thereby introduce an inappropriate form of development into the Green Belt, result in an unacceptable erosion of the Green Belt and result in an adverse and detrimental impact on its character.

Fraser Carlin  
Head of Planning and Housing

Local Government (Access to Information) Act 1985 - Background Papers

For further information or to inspect any letters of objection and other background papers, please contact David Bryce on extension 7892.





Renfrewshire  
Council

16/0594/PP

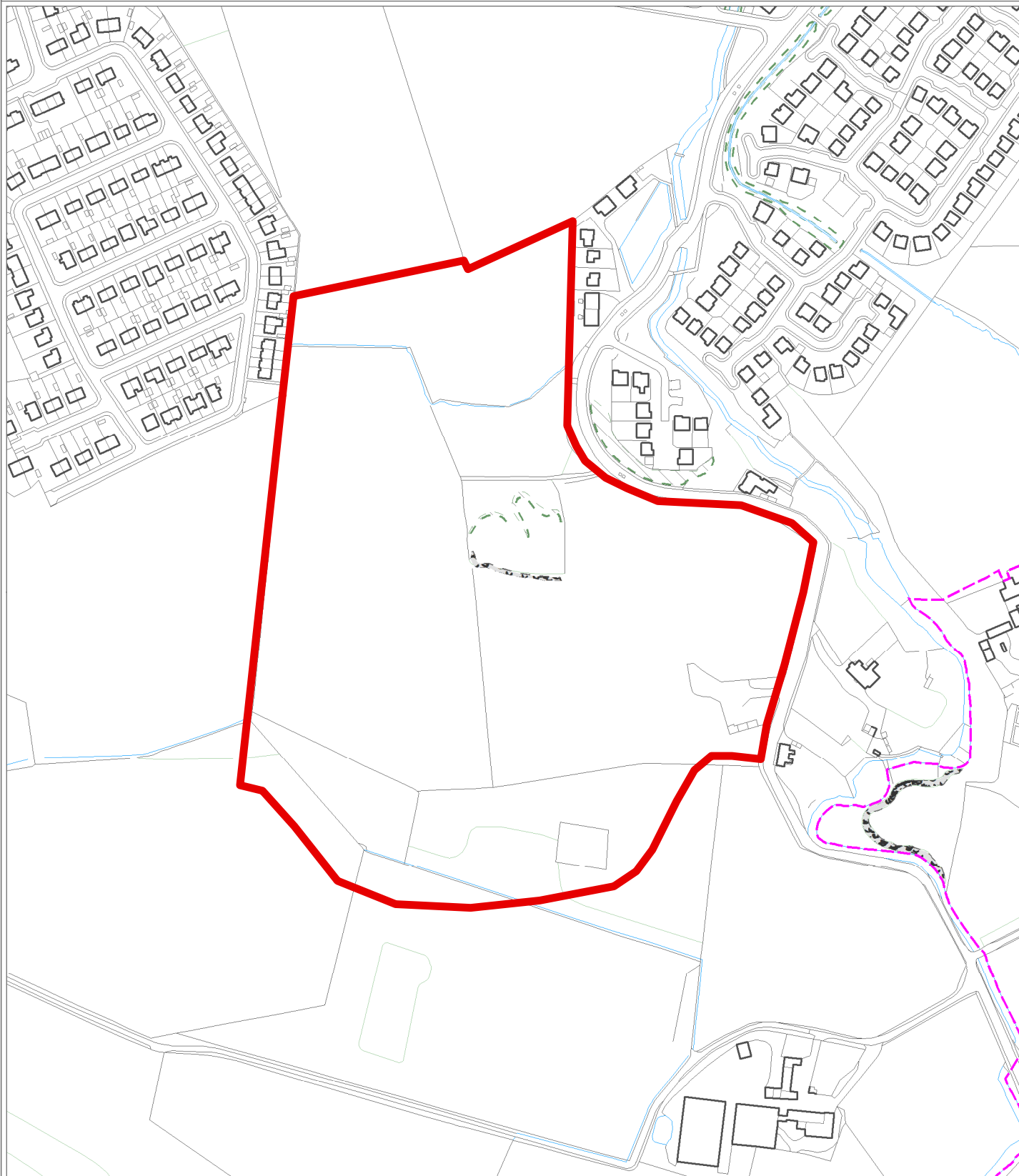
Site between Dunvegan Avenue and Gleniffer House,  
Glenpatrick Road, Elderslie



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User: ptcameronr1

Date: 11/10/2016



Notes:  
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