

Proposed Local Development Plan 2

Main Issues Report
October - December 2019
Report of Consultation

2020



September 2020



sustainable thriving achieving

East Dunbartonshire Council

www.eastdunbarton.gov.uk

Local Development Plan 2

Report of Consultation

Stage 2 – Main Issues Report

October – December 2019

Contents

Executive Summary.....	3
1. Background and Purpose	16
2. Consultation Awareness Raising	18
3. Engagement Methods.....	20
4. Key Findings	27
Objectives.....	28
Bearsden	36
Bishopbriggs.....	47
Kirkintilloch, Lenzie and Waterside.....	72
Lennoxton, Milton of Campsie, Haughhead and Clachan of Campsie	113
Milngavie.....	128
Torrance and Baldernock.....	140
Twechar.....	147
How can we address housing need in the right location?	157
How can we create vibrant and successful Town Centres?.....	194
How can we best prepare for the impacts of climate change?	199
How best can we ensure land is available for business development?.....	216
Can we be more proactive in developing our visitor economy?	226
Should we carry out a review of historic environment designations?	230
Minor areas of change – Comments.....	235
What is not changing? – Comments	243
General Comments	245
5. Next Steps	249

Executive Summary

Introduction

On 26 September 2019, East Dunbartonshire Council approved the Local Development Plan 2 'Main Issues Report' (MIR) for publication and consultation. Subsequently, the Council's Land Planning Policy team organised public consultation on the MIR between October and December 2019. The MIR sets out a series of planning policy options for future development throughout East Dunbartonshire and is a key step in preparing a new Local Development Plan for the area. This will succeed the current Local Development Plan (2017), which must be replaced by February 2022. The consultation period lasted for 8 weeks, from 15 October until 10 December 2019. The main objectives of this consultation process were to:

- Seek views on the Council's preferred and alternative options;
- Provide an opportunity for all stakeholders to help shape the overall development strategy for LDP 2;
- Provide an opportunity for any further site suggestions; and
- Engage with local communities and other interested parties on the Local Development Plan process

The outcomes of this consultation have helped inform the content of the Proposed LDP 2, which represents the Council's settled view on a planning and development strategy for East Dunbartonshire.

Consultation Awareness Raising

The Council aimed to gather views from as many people and groups as possible in order to help shape the forthcoming Local Development Plan for East Dunbartonshire. The Council raised awareness of this consultation through the following means:

- An extensive social media programme which had a combined social media reach of over 280,000 people
- Press releases describing the consultation and details of how to get involved
- Distributing details of the consultation in the Local Development Plan newsletter which is sent to over 600 individuals and organisations
- Direct mailing to community councils, local groups and organisations
- Producing a leaflet which was widely distributed across East Dunbartonshire
- Creating a dedicated consultation webpage which included all relevant information on how to participate
- Contacting key agencies and stakeholders to raise awareness and encourage participation in the consultation

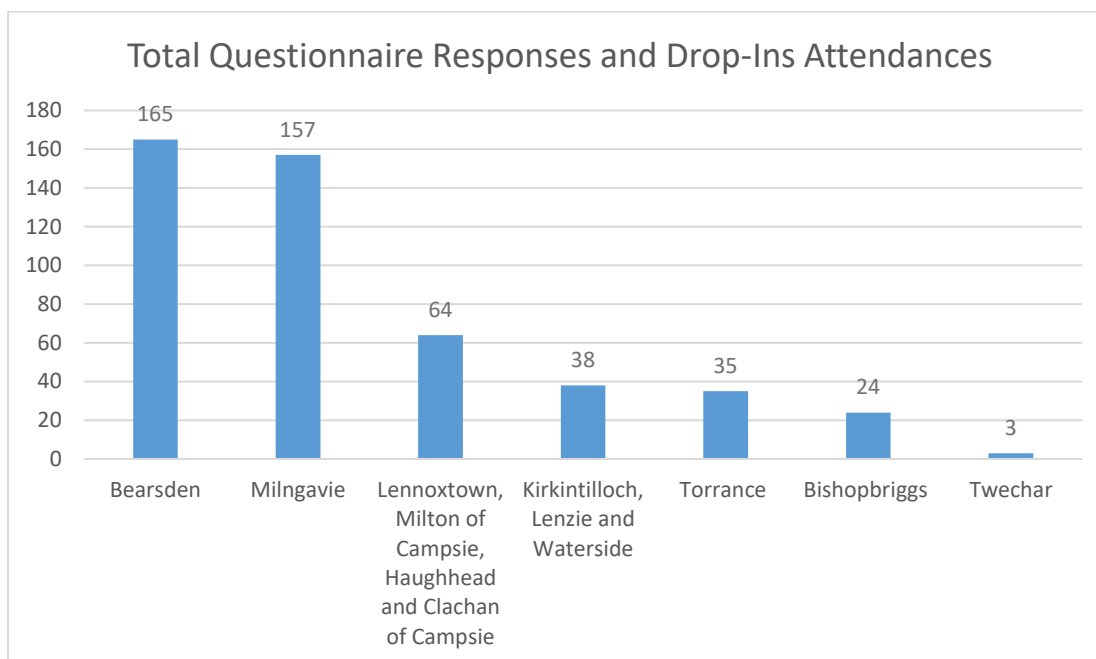
Consultation Methods

A range of methods were used to gather views throughout this consultation. A summary of these methods, including estimates of the number of people who engaged in each, are detailed in the table below.

Method	Description	Approximate number of people who engaged
Community Council session	Officers invited all community councils to an information sessions	11
Community drop-in sessions	Seven drop-in sessions were held across the authority area	253
Questionnaire	Online and paper questionnaire seeking views on the consultation	256
Email responses	Responses from individuals and organisations were accepted by email	526
Schools Workshop	Interactive workshop facilitated by Council officers	19
Total		1065

Key Outcomes by Community Area

The figure below shows the total number of questionnaire responses and drop-in session attendances for each community area.



The main planning themes that emerged in each community area and policy theme are summarised below.

Objectives

There was broad support for the preferred option relating to the objectives. A number of respondents did however support the reasonable alternative option for LDP2 to 'deliver good quality homes that meet local needs, including a range of tenures and house types through modest growth'. One respondent did not agree with either preferred or alternative option for housing, arguing that the alternative option wrongly implies that by providing more housing it will be less sustainable than the preferred option. It was argued that the objectives and strategy of LDP2 must focus on the delivery of sustainable sites for housing, but which have demonstrated

that they are effective and can be delivered, on brownfield and greenfield sites. Brownfield sites in greenbelt should be made available for single house development.

Other responses outlined a desire to see improvement to blue/ green infrastructure, air quality and avoidance of flood risk mentioned under objectives, although appreciate they are picked up under specific policies. There were also requests for the health and wellbeing objective to be broadened to refer to the historic environment. Some responses also expressed a preference for maintaining a 'design-led' approach to development and the importance of the provision and enhancement of multi-functional green networks in good place-making.

Several respondents identify that their site proposal can contribute to meeting these objectives.

Bearsden

Bearsden Town Centre Strategy: There was clear support for the preferred option, to integrate the town centre strategy within LDP2. A range of suggestions on how to improve the town centre were also provided.

New Housing: The Council received a large number of responses in support of the Council's preferred option from local residents, community organisations and key agencies. In particular, most responses expressed concern about the potential impact of various proposed sites submitted at the 'call-for-sites' stage, including the area known locally as 'Craigdhu Wedge'. Taken together, these concerns covered a wide range of issues and broadly speaking related to one or more of the following:

- Protection of the greenbelt and importance of preserving open space and recreation land
- The area cannot accommodate more housing
- New development would have an unacceptable impact on road traffic and local infrastructure
- Increased pressure on local services and community facilities including GP surgeries, schools, nurseries and other health facilities
- Lack of water and waste water infrastructure capacity
- Negative impact on local air quality
- Loss of agricultural land
- Negative impact on woodland, wildlife habitats and biodiversity
- New development would lead to increased carbon emissions and would be incompatible with climate change targets
- New development would increase the risk of flooding
- Important to prevent the coalescence of Bearsden and Milngavie, as they are two distinct communities
- New housing should only occur on brownfield land, including refurbishment of older and inefficient homes

A number of comments disagreed with the preferred option on the basis that there is a lack of housing for the elderly in the area. A very small number of responses raised concerns over the two preferred option sites (S311 and S360), on the basis that parking is already very difficult and the area of open space is well used.

Submissions from site promoters and the development industry all disagreed with the preferred and alternative option, arguing that the housing land supply is insufficient and in most cases providing a response to the respective 'site assessment' for their site, with suggested amendments.

A81 Transport Corridor: The vast majority of responses agreed with the preferred option and in particular the "strong sustainability focus". However, there was considerable concern relating to the air quality at Bearsden Cross, which was seen by many people to be very poor. Improving air quality (and avoiding any deterioration) here was therefore seen as a key priority by local people. Other comments on the different aspects of the A81 corridor are set out as follows:

- *Active travel* - A substantial number of comments referred to the existing Bears Way segregated cycle way, and in particular its future status. A number of responses suggested that it should be removed and replaced by a bus and cycle lane. Others stated that it should not be extended, while a number of responses suggested it should be extended further into Glasgow, to provide a safer cycling environment and encourage more people to use it. It was also considered by some that the junctions are unsafe in places, resulting in some cyclists choosing to use the main road carriageway. A small number of responses pointed out that cycling is not an option for some people.
- *Bus* - Some comments suggested that improving bus services in the area will remove cars from the A81. Comments requested more frequent bus services were required and that there was no bus provision in the Mosshead area. A number of comments requested a loop bus to operate in the Bearsden and Milngavie area.
- *Rail* - Many comments were received requesting an additional station is delivered at Allander, with associated parking, while other comments said this additional station was not required as Hillfoot station is within healthy walking distance. It was also requested that the rail line is dual-tracked to assist with the poor performance of the line. Transport Scotland responded stating they did not support further feasibility work on a potential station at Allander and would also not support safeguarding the land for this proposed station if there wasn't a commitment to carry out this further work. Network Rail and SPT agreed with the preferred option, however Network Rail noted the close proximity of the potential Allander site to Hillfoot and Milngavie stations and state this may raise issues in terms of achieving appropriate line speed between stations and impacts on existing and future timetabling. Network Rail also noted they were working with the Council on the STAG study on the A81 which would be including assessment of options to improve performance of the line.
- *Parking* - It was requested that more parking is required at rail stations. It was also requested that there should be a period of free parking in Council car parks and that better parking in town centres is required overall.
- *Roads* - Many comments stated that recent development in the area has increased road congestion and that road infrastructure is at capacity and that Canniesburn Toll in particular will become a bottleneck.

Visitor Economy: Responses were overwhelmingly supportive of the preferred option, from both local residents and key agencies. A small number of responses did suggest Bearsden has limited tourism/visitor potential, especially given its proximity to Glasgow which has more to offer. A range of suggestions were made, including the following:

- We could make much more of the Roman connection
- Preservation of green spaces will attract more visitors
- More (free) parking would make it easier to attract visitors
- There is a need for short stay accommodation in the area. Is there opportunity to team up with Visit Scotland to develop a Tourism Strategy for EDC as a whole rather than have separate piecemeal objectives for the main areas?

Cemetery Provision: The preferred option was overwhelmingly supported. However, a number of comments highlighted the importance of ensuring no adverse impact on the Antonine Wall World Heritage Site Buffer Zone. It was suggested that any future development should include a new crematorium, as this is becoming

more common. One comment requested that the cemetery site should be set back from the main road. Another expressed concern that there is no assessment of the environmental impact, and that there should be more environmentally friendly burials.

Bishopbriggs

Auchinairn Place Plan: Some responses agreed with preferred option of including land use priorities in Plan, including giving them higher status. Other responses agreed with alternative option of cross referring to it as guidance on the basis that the Place Plan has not been published, is not part of the Development Plan and guidance is a material consideration for planning applications and easier to update. One comment general did not want more housing but looked for encouragement of specifically built housing for disabled people and their families.

Bishopbriggs Town Centre Strategy: some support for the preferred option, other comments support alternative option because: the actions in the Strategy and their relevance and timescales will need updated in line with other emerging plans and strategies. It is important that there is a masterplan for the entire Bishopbriggs town centre, with emphasis on the civic space, and opportunities for green infrastructure, walking and cycling and encouraging people to visit, shop and be proud of. Concerns that the impact of supermarket will not help the struggling retail centre, any petrol station should cater for electric vehicles and housing will add to congestion and badly affect air quality and schools.

New Housing: There was no clear consensus on the preferred option. Comments made included: concern that secondary schools, primary schools and doctors' surgeries are at capacity and need new investment before new housing can be built; schools admission policy should be taken into consideration when considering new housing; concern about the traffic impact of development; against release of greenfield sites when there are available brownfield sites; do not want new housing unless it is for disabled people; further assessment of environmental and community impact should be carried out before these sites are allocated. Concern about the biodiversity and hydrological impact of sites 362 and 363 on the Low Moss. Agree that the sites at Westerhill (S303, S312, S318) should be masterplanned to address biological impact. The submissions from site promoters and the development industry include: for site S5 Wester Lumloch does not disagree with the preferred option; S343 Crofthead Phase 1 & 2 do not agree with the preferred or alternative option and submissions are made for the allocation of housing at S203 Former Westerhill Rail Sidings; S340 and S341 (alongside S342 other uses) at North Bishopbriggs. In addition they consider that the housing land supply is insufficient, their site is effective and provide detailed comments on the benefits of the site. For site 6.20 Crofthead the agent disagreed with preferred and alternative options for the deallocation of the site, and considered that the light pollution issues from the adjacent business can be addressed in the development. The agent or and developers for sites S306 Former Bishopbriggs High, S312 Birkhill and S Strathkelvin Retail Park support their inclusion in the preferred option/ preferred option subject to further assessment. Some agents also provide detailed comments on the site assessment and/ or Strategic Environmental Assessment of their site and refer to supporting specialist studies.

Visitor economy: in the main agree with preferred option. Opportunities for leisure, food and drink and craft shops on the canal side have been lost in the past. This encourages best use of the areas assets while seeking to manage and direct demand. Criteria to promote the tourism/visitor economy, with specific focus on 'Tourism Asset Areas', should also provide for their understanding, protection and enhancement, in particular the Management Plan and Supplementary Guidance for the Antonine Wall. Some comments that Bishopbriggs town centre is declining and would not attract visitors.

Cemetery provision: in the main responses support the preferred option, including comment that being near the main road is the best location. One comment is that although the site is immediately adjacent to the Antonine Wall World Heritage Site and within its Buffer Zone, direct impacts can be mitigated by prior archaeological investigation and setting impacts may be mitigated by design. Other comments are that ground water investigative measures need to be carried out in order to determine the feasibility of the cemetery site and the geological LNCS and other similar sites should be protected. Some comments were made concerned that the site was too large and would get in the way of the future route and junction for the relief road.

Strathkelvin Retail Park: the majority of responses agree with the preferred option, comments include: the local area needs more shops, leisure and recreation activities. A significant amount of the retail park benefits from unrestricted retail consent. The retail capacity assessment in the monitoring statement states the amount of comparison floorspace in the retail park, however a significant amount of this could be used for convenience. However other comments disagree with the preferred option as it does not reflect the retail park, states that there is a need to protect Bishopbriggs Town Centre and improve it as a retail and leisure destination. If convenience retail is allowed at the retail park then town centres will all suffer the consequences. Also need to protect the role of town centres. Another comment, supportive of the alternative option, is that the retail park should remain as it is with a mix of food, clothing and other shops, restaurants. Other comments – support for the site being expanded with a cinema and more shops or restaurants; concerned with traffic at the retail park.

Westerhill: In the main comments are supportive of the preferred option, with some comments supporting: redevelopment of brownfield land; retail, business/ employment and cemetery. Comments agreeing with expansion of retail park for cinema, shops and restaurants. Support for active travel, park and ride for rail and bus. Agree need to protect the green belt, wildlife corridors, peatland and local nature conservation sites. Agree that developer contributions are required to deliver road and rail infrastructure. Consider that the location of housing should take sustainable travel options into consideration. Some comments raised concern about inclusion of housing, including until capacity of schools and doctor’s surgeries is increased. Other comments are unsure about need for cemetery, any development should not encroach on greenspace/ nature reserve and unsure if business is needed. Another comment considers that the extension of the retail park would have an adverse impact on the Local Nature Conservation Site and open space. A few comments supported the alternative option, as this will provide a mix of business, residential and commercial uses but does not have the risks of the preferred option. This will have least impact on Local Nature Conservation Site and limit over development.

Other comments include: park and ride is not as important as public transport and active travel routes. Concern at impact on traffic and air quality. Need further assessments carried out before sites are allocated. Comments from companies promoting sites for development in the Westerhill area generally support the preferred option, the masterplan approach and the inclusion of their site, which they consider effective. They support the masterplan process. These include the promoters of housing at S312 Birkhill Avenue; and leisure, retail and food and drink uses at S304 North East of Strathkelvin Retail Park. Other comments include: There should be further opportunities to extend the settlement beyond the proposed relief road. Other comments: would like the eastern part of the former railway sidings at Cadder yard to be included in the masterplan, to incorporate rail halt, park and ride. Network Rail noted that they plan to use Cadder Yard for a track renewals depot and a mini High Speed Trains stabling/fuelling facility and that this may not be compatible with a new station. Transport Scotland responded stating they did not support further feasibility work on a potential station at Westerhill and would also not support safeguarding the land for this proposed station if there wasn’t a commitment to carry out this further work

Kirkintilloch, Lenzie and Waterside

Vacant and Derelict Business Land: More than three quarters of individual respondents were in support of re-evaluating vacant and derelict land with a business and employment designation to allow some alternative uses. Comments were supportive of bringing sites back into use in general, with alternative uses deemed preferable to continued vacancy, and housebuilding on business land to be more acceptable than releasing sites in the green belt. Some responses from individuals were in favour of the alternative option of retaining the vacant sites for business and employment use. It was noted that there is a need to ensure that there are accessible business sites in Kirkintilloch to reduce the negative impacts of commuting on the environment and local economy. Most of the responses from businesses or organisations were supportive of the preferred option in principle, but with some house-builders and landowners feeling that the description of suitable alternative uses for the sites in which they have specific interest should be further removed from including any additional business and employment use. One business was in full support of the alternative option, noting concerns about development constraints on some of the sites, as well as the need to maintain a business and

employment land supply. SEPA and SPT were supportive of the preferred option, although SPT noted that applications for alternative uses should consider site accessibility. SNH was also supportive of the preferred option, but with the caveat that Woodilee Industrial Estate/ Kirkintilloch Gateway should produce a development brief and that all proposals for alternative uses on vacant and derelict land should consider the impacts of development on biodiversity. Two key agencies – NHS Greater Glasgow and Clyde and Scottish Water, did not take a particular view on the issue but emphasised that any development on the sites must take into account the capacity of local healthcare provision and water supply respectively.

Lennoxton, Milton of Campsie, Haughhead and Clachan of Campsie

Lennoxton Place Plan: Mainly supportive of preferred option, including giving its priorities higher status. Other comments support the alternative option as Place Plans have not been through as much public consultation as Development Plans and are less likely to be based on commercial understanding of development, be realistic or deliverable. One comment is that the production of a Place Plan may not fit with Plan timescales so keeping it as guidance would ensure it is a material consideration for planning applications. Another is that through delivery of new housing development at Lennoxton there is potential scope to contribute towards Place Plan projects. One other comment does not agree with either option but wants to prioritise keeping community identities, a strong community and green belt protection.

New Housing: In the main respondents agreed with the preferred option. There were some comments in support of the option site S321 St Machan's Way as it is affordable housing on brownfield land and accessible by public transport, provided flood risk is avoided. There was also support for the retention of greenbelt for its recreational and wildlife value, setting of the villages and value for tourism, in particular at the wood at Redhills and around Milton of Campsie at Redmoss and Birdston. In the main there were objections to the alternative option of allocating site S322 Derrywood Road for reasons including: congested roads, impact on air quality, lack of facilities in settlement, loss of green belt land of value for biodiversity, informal recreation and settlement setting. There were however some comments supporting the Derrywood site as it was affordable housing and is a gently sloping site which could accommodate some development. Comments highlighted the need to protect adjacent native woodland, retain trees and path links and a water and drainage impact assessment will be required. SEPA would be opposed in principle to a development at site 6.56 Lennox Castle Hospital which conflicts with flood risk policy.

There were submissions from site promoters and the development industry many of whom disagreed with the preferred and alternative option, arguing that the housing land supply is insufficient. Existing allocated sites at 6.52 Campsie Golf Club, 6.58 – Lennoxlea and 6.56 Lennox Castle Hospital were supported on the basis that they are effective and/ or any flood risk can be addressed. Comments were made on suggested sites S18 Redmoss Farm, S205 West Birdston, S314 Rowantree Place, S375 Kincaidfield - were that they are effective, free of constraints and/or which fit into settlement form. Some promoters also provided a response to the 'site assessment' for their site, with suggested amendments. Other comments include: deallocate site 6.58 Lennoxlea as development there would increase car use and put a strain on infrastructure and together with the site to the east would lead to settlement coalescence. Oppose any more development in Milton of Campsie green belt as it is valuable for recreation and biodiversity, has poor access to public transport, it will have an adverse effects on air quality, flood risk and facilities and congested roads cannot accommodate this.

Visitor economy: General support for the preferred option, comments include: that Lennoxton is neglected and visitors have nothing to stop for so it needs improved; and better to focus tourist development on particular areas so the appropriate facilities can be provided. This encourages best use of the areas assets while seeking to manage and direct demand. Criteria to promote the tourism/visitor economy, with specific focus on 'Tourism Asset Areas', should also provide for their understanding, protection and enhancement. Other comments are that green belt and green areas, including Redmoss, should be protected and conserved for wildlife to make them attractive to walkers and promote the local pubs and cafes.

Lennox Castle: some comments supported the preferred option, including the following problems with the site: no demand for houses there, it is not deliverable, environmental sensitivity and the site is a distance from shops and other facilities. One comment does not support the preferred option, because it presents no potential solution for the building at risk. However the majority of comments supported the alternative option, including a desire to see the historic castle preserved. One comment is that the Category A listing is not a constraint to development as the sole reason that development would be acceptable in this location is due to its enabling role for the listed building. It notes that it may be beneficial to remove the current housing allocation if there is a risk of independent development in the vicinity of the castle which would compromise future enabling options. One other comment would like the site to be developed for housing.

Milngavie

Milngavie Town Centre Strategy: Responses were broadly supportive of the preferred option to integrate the strategy within the plan, however, a number of responses (including community organisations), highlighted that the strategies are 'live' documents that may need to be updated during the LDP2 period. A number of specific suggestions were made on improving the town centres, including better integration of the town hall, art gallery and library/community education centre.

New Housing: The Council received a large number of responses from local residents in support of the Council's preferred option. In particular, most responses expressed concern about the potential impact of various proposed sites submitted at the 'call-for-sites' stage, including the areas known locally as 'Craigdhu Wedge' and 'Dougalston'. These mainly related to sites S16, S25, S49, S300, S301, S302, S313, S15, S186, S223. Taken together, these concerns covered a wide range of issues and broadly speaking related to one or more of the following:

- Protection of the greenbelt and importance of preserving open space and recreation land
- New development would have an unacceptable impact on road traffic and local infrastructure
- Increased pressure on local services and community facilities including GP surgeries, schools, nurseries and other health facilities
- Lack of water and waste water infrastructure capacity
- Negative impact on local air quality
- Loss of agricultural land
- Negative impact on woodland, wildlife habitat and biodiversity
- New development would lead to increased carbon emissions and would be incompatible with climate change targets
- New development would increase the risk of flooding
- Important to prevent the coalescence of Bearsden and Milngavie, as they are two distinct communities
- Protection of historic buildings and structures such as the Doocot at Dougalston
- Protection of Local Nature Conservation Area (Dougalston)
- New housing should only occur on brownfield land

A smaller number of responses opted for the alternative option to include site S227, as it was suggested there is a need to retirement housing in the area. Also, this type of housing would not cause much of an issue in terms of additional traffic, it was suggested. In addition, other responses stated that there is a need for more housing generally in the area, especially affordable housing.

Comments were also made in relation to other sites within the settlement area including S336 Ashburn Rd/Craigielea Cresc, S220 Edgehill Road and S317 Mugdock Road. It was considered vital to protect these spaces as they are considered important for health and wellbeing, nature conservation interest, reducing pollution and improving air quality.

Submissions from site promoters and the development industry all disagreed with the preferred and alternative option, arguing that the housing land supply is insufficient and in most cases providing a response to the respective 'site assessment' for their site, with suggested amendments.

A81 Transport Corridor: Whilst the vast majority of responses were in favour of the preferred option to implement the LTS and ATS, this issue generated a wide range of comments and concerns relating to transport in Milngavie. The preferred option was largely favoured for at least one of the following reasons:

- Would help to alleviate parking issues in and around Milngavie station
- Helps to tackle climate change by encouraging people not to drive
- Support a quality bus corridor and junction improvements on A81
- Modal shift is essential
- Integration and scheduling of public transport is vital, including to peripheral areas
- Important to improve local path network to surrounding areas
- Imperative that rail service is improved

In terms of other comments and concerns relating to the A81 transport corridor, key points are set out below:

Active Travel: A substantial number of comments referred to the existing Bears Way segregated cycle way, and in particular its future status. A number of responses suggested that it should be removed and replaced by a shared bus, taxi and cycle lane. Others stated that it should not be extended, while a number of responses suggested it should be extended further into Glasgow, to provide a safer cycling environment and encourage more people to use it. It was also considered by some that the junctions are unsafe in places, resulting in some cyclists choosing to use the main road carriageway. Other comments included:

- Important to protect footpaths including those through green areas
- Footpaths in the Dougalston area should be repaired
- Better cycle provision is required however it should not be where there is no room for a cycle lane
- A cycle path should be connected to Douglas Academy

Bus: There were a substantial number of requests for improved bus services including a direct bus link to the Queen Elizabeth University Hospital, better integration between bus and train, a bus lane for commuters and an express bus service at peak times.

Rail: Many comments were received requesting an additional station is delivered at Allander, with associated parking, while other comments said this additional station was not required as Hillfoot station is within healthy walking distance. It was also requested that the rail line is dual-tracked to assist with the poor performance of the line. Transport Scotland responded stating they did not support further feasibility work on a potential station at Allander and would also not support safeguarding the land for this proposed station if there wasn't a commitment to carry out this further work. Network Rail and SPT agreed with the preferred option, however Network Rail noted the close proximity of the potential Allander site to Hillfoot and Milngavie stations and state this may raise issues in terms of achieving appropriate line speed between stations and impacts on existing and future timetabling. Network Rail also noted they were working with the Council on the STAG study on the A81 which would be including assessment of options to improve performance of the line.

Roads: A number of comments alluded to traffic congestion, particularly at peak times. It was noted that there is congestion on the A81, A807 Auchenhowie junction, with rat-running drivers causing road safety issues for pedestrians including children.

Parking: A substantial number of comments called for the re-introduction of free parking, for short term stays within Council car parks. In addition, there was widespread support for additional parking at rail stations.

In terms of groups and organisations, most responses were supportive of the preferred option, with additional commentary on specific aspects of the LTS/ATS. A small number of responses from the development industry

disagreed with the preferred option, stating that the strategies may require alteration during the LDP2 period, and suggested that specific projects could only be delivered through funding from housing development.

Visitor Economy: Responses from local resident's community groups and key agencies were overwhelmingly in favour of the preferred option. A number of suggestions and further comments were submitted as part of some responses:

- A visitor or welcome centre for the West Highland Way should be provided at the community and education centre
- We can do more to promote the town as an international walking destination
- Need to build on the potential of the art gallery and reservoirs
- Any tourism facilities must be authentic and relevant to the local area
- Need a permanent heritage space in the town centre, particularly if it is linked to the new Hub
- Important to provide public toilets with longer opening hours
- More people would visit if they could cycle safely – need to finish the Bearsway project
- Should promote other walking routes such as Clyde Coastal Path and Allander Way
- People need to be encouraged to walk to Mugdock Country Park, rather than drive
- Could have a guided nature walk every month to generate interest
- Include Gavin's Mill as a key tourism asset

Torrance, Balmore, Bardowie and Baldernock

New Housing: Preferred option had some support, including for development of a brownfield site. However there were also concerns about the site S204 East of Ferrymill Motors. Concerns included traffic impact, amenity, noise and air pollution impact of the adjacent business, lack of facilities and public transport in the village to support population, reopening of former right of way. Another comment was that the site should only be developed for housing if the adjacent business relocates. The promotor supported the option site S204 and commented that it is deliverable, effective and free from constraints and that any amenity issues can be addressed through design. They also identified that the adjacent business is looking to relocate. A Water and Drainage Impact Assessments would also be required for the site. There was some support for the alternative option of reassessing housing on the site 6.16 Balmore Garden Nursery, including SEPA which objects in principle to the development which conflicts with flood risk policy. However the site promotor objects to alternative option and consider site is viable and deliverable and flood risk issues can be addressed; other comments want the site retained in the Plan because it is brownfield land, has good access to roads, will provide new housing in Baldernock Parish and provide the opportunity to improve pedestrian crossing on Balmore Road. Submissions from site promoters and the development industry disagreed with the preferred and alternative option, arguing that the housing land supply is insufficient. They also suggesting their site is effective for development and free from constraints, including the following sites: Site S222 South Campsie Road, Torrance and in Balmore: S221 East Balmore, S23 at Balmore Paddock and S374 Bogside Road. In some cases also provided a response to the respective 'site assessment' for their site, with suggested amendments. Other comments did not want further development in the countryside setting of Balmore or in Torrance and its' green belt, which has value for health and wellbeing and recreation. One comment is that the Kelvindale Nursery site should to be developed for housing for the elderly with facilities.

Twechar

Twechar Place Plan: There was clear support for the integration of the Place Plan into LDP 2, to elevate their status.

Regeneration Sites: There was broad support for the proposed redevelopment of sites at Glen Shirva, Macdonald Crescent and Twechar Canalside. Concerns were raised about the potential impact on mature woodland at the Macdonald Crescent site, and the importance of maintaining a strong landscape framework, and also addressing any flood risk impacts associated with the canalside site.

Tourism Asset Areas: There was clear support for the preferred option to identify the Antonine Wall and Forth & Clyde Canal as tourism asset areas.

Badenheath: The promoter of this site supported the alternative option to retain this site within the Plan, as they considered that it remains a suitable location for a development of this type. Specifically it will providing continuity and confidence to the development industry to allow them to take their proposal forward. It was considered that its deallocation would be a potentially critical change which would likely result in no development taking place and the loss of significant and substantial inward investment and employment opportunities to East Dunbartonshire. However, SNH agreed with the Councils preferred option to remove the site from the Plan, primarily because of adverse landscape impacts.

How can we address housing need in the right location?

There was widespread support from local residents and most key agencies for the overall approach to housing land supply set out in the preferred option. The housing land requirement selected in the preferred option allows the Council to pursue a strategy of protecting greenbelt and greenfield land to encourage development of brownfield land across the Glasgow City Region, which was overwhelmingly welcomed by local residents.

Local residents and groups were also largely in favour of the preferred options to improve the quality of new house building, including increasing the diversity of housing styles and types, and to increase the supply of housing for older people in order to address the ageing population. Whilst very few individuals made specific comments on the preferred options for developer contributions, many respondents stated concerns about the impact of new housing on existing infrastructure and community facilities, particularly health and education provision.

The development industry however did not support the preferred option for housing land and largely supported option 3 to sustain current rates of completions long-term. This option would consequently result in a much greater number of allocations for new housing being made in the LDP. Therefore, given that there are relatively few brownfield sites in East Dunbartonshire this option would require the significant release of greenbelt and greenfield land. With regards to the housing land requirement for the LDP, many developers stated that the adopted Clydeplan Strategic Development Plan requires housing need to be met at the sub-housing market level and therefore housing targets for Bearsden and Milngavie and Strathkelvin need to be met separately.

The development industry also did not support the preferred options regarding improving the quality of new housing and increasing the supply of older peoples housing. This however was generally not on the grounds of disagreeing totally with the overall aims of the preferred options, but rather that determining how these issues should be addressed was a matter for the market to decide, or where public intervention was deemed necessary that this should be achieved through the Building Standards process. In terms of developer contributions opinions from developers were more split on the options presented for reflecting the removal of Supplementary Planning Guidance by the Planning (Scotland) Act 2019.

How can we create vibrant and successful Town Centres?

There was widespread support for including a presumption against certain uses that can lead to poor health and negative social outcomes. This issue generated a large number of suggestions and recommendations on how to improve health and wellbeing. Many comments focused on how to improve town centres in a general sense, as opposed to the health and wellbeing of local communities. In terms of retail capacity, responses were more mixed, and some felt that maintaining the current approach to assessing retail capacity is appropriate.

How can we best prepare for the impacts of climate change?

There was clear support for a new policy focusing specifically on climate change and sustainability, and for the importance of climate change as a key planning issue more generally. In relation to biodiversity, there were mixed responses in terms of the best way to ensure protection and enhancement. Whilst there was support for the preferred option, others felt it does not go far enough. Conversely, development industry representatives expressed concerns about all options and suggested that the current policy should be retained. There was also overwhelming support for strengthening the policy framework for active travel, electric vehicle infrastructure and heat networks.

How best can we ensure land is available for business development?

The majority of responses were in support of broadening the use classes permitted on business and employment sites beyond strictly classes 4, 5 and 6, as long as any alternative uses are compatible with existing businesses and conflict is not created with town centre and sustainable transport policies. With regards to the de-allocation of some business and employment sites for alternative uses, responses were more mixed. Some comments were fully in favour of deallocating sites if it would mean development progressing on vacant and derelict land, whereas others highlighted the importance of retaining sites for business and employment use. There was general consensus in favour of development being on brownfield sites – either for business or alternative uses – rather than on new sites released from the green belt. All respondents unanimously agreed that the potential regeneration of allocated business and employment land should be considered in order to increase their commercial attractiveness.

Can we be more proactive in developing our visitor economy?

On the whole, respondents were in agreement with the preferred options for updating the tourism policy. Some comments that supported the proposed tourism-assets-based approach to encouraging development noted that improving parking, public transport and active travel routes are required to encourage more visitors to East Dunbartonshire. A couple of the responses were uncertain about the preferred option and asked for more detail to be provided about the type of proposed development for each asset area and how the location of the areas will be defined. The key agencies, including: Go Bike, Historic Scotland, SPT and SNH, were all supportive of the asset-based approach. All responses supported the inclusion of policy wording for potential future regulation of short-term lets. SPT suggested in their response that there should be leeway in the policy to move towards the alternative option (of not only allowing for regulation of short-term lets, but also requiring applications to consider potential impacts on housing supply).

Should we carry out a review of historic environment designations?

Conservation Area/ Townscape Protection Area Review: Overall support for the preferred option of a review. Historic Environment Scotland commented that a review will ensure that these designations are up to date and fit for purpose. There were comments on the need to enhance, improve or care for existing sites. Other comments are that sites should not be de-designated, and Baldernock should be consulted on any changes. Specific areas highlighted for protection and / or promotion include the Antonine Wall, Huntershill House and Baldernock rural area, which is under pressure from traffic and signage. Comments that the current guidance needs updating and should allow for sustainable design and that designation of new areas should be considered, especially areas of rural beauty with landscape features that need protecting. Another comment is that the sites of archaeological importance should be redefined, as some sites are missed. Does not agree with de-designating historical buildings and areas which were once conserved if they are to be replaced with further housing.

Locally Important Garden and Designed Landscape Review: Overall support for the preferred option of a review. Historic Environment Scotland agree the review of locally important gardens and designed landscapes to ensure that they are up to date and fit for purpose. Other comments are that this review should protect and enhance the value of these areas and make them accessible where reasonable. A similar review should be conducted for the ancient woodland inventory at a local level. Specific areas highlighted for review include Milngavie Golf Club, which has historic features that could be made more accessible and the Campsie Fells, for walking, car parking and tree planting. Comments stated that no lower quality areas should be de designated, including in Milngavie, but improved and enhanced. Other comments are concerned that the review of lower quality areas may result in landowners neglecting areas and selling them for housing, many of the developers' calls for sites fall in designated areas. These areas require protection.

Post-Consultation Steps

The results of this period of consultation will help shape the contents of the Proposed LDP2, which is scheduled for publication and consultation in 2020. Following the end of the proposed LDP 2 public consultation period, the Council will consider all responses and then submit the Proposed LDP 2, together with any

unresolved representations, to the Scottish Government for examination. This is an independent review process carried out by a Reporter appointed by Scottish Government Ministers. Only once the Examination has been completed can the Council proceed with adoption of LDP 2. Full details of the LDP 2 preparation process are set out in our [Development Plan Scheme](#). This is updated annually.

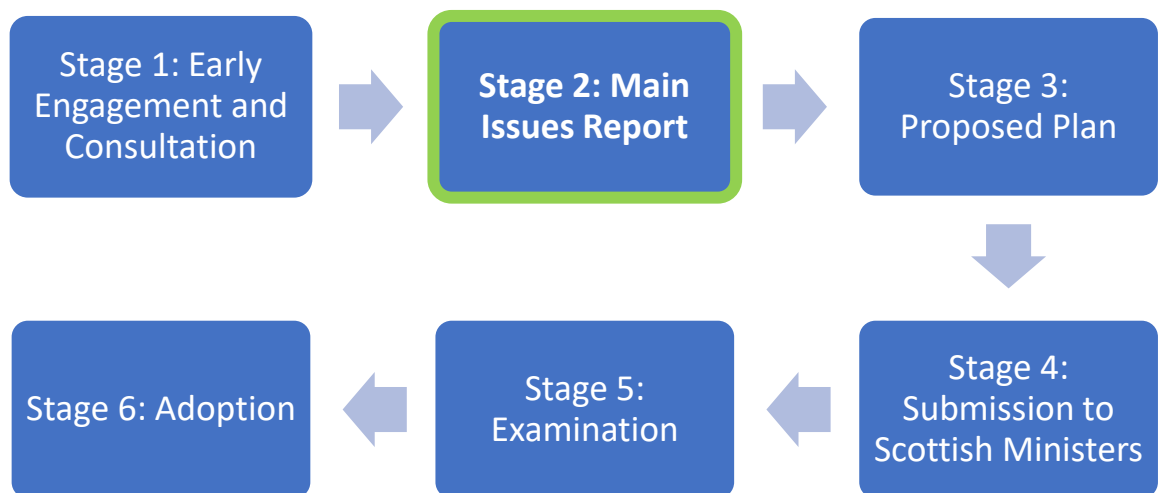
1. Background and Purpose

The Main Issues Report consultation represents a significant step towards the preparation a new Local Development Plan for East Dunbartonshire (LDP2). It is the second main stage in the overall process of preparing and adopting a Local Development Plan. This is illustrated in the diagram below.

Early engagement took place between Tuesday 15th October 2019 and Tuesday 10th December 2019. The main objectives of this consultation process were to:

- Seek views on the Council's preferred and alternative options;
- Provide an opportunity for all stakeholders to help shape the overall development strategy for LDP 2;
- Provide an opportunity for any further site suggestions; and
- Engage with local communities and other interested parties on the Local Development Plan process

The outcomes of this consultation have helped inform the content of the Proposed LDP 2, which represents the Council's settled view on a planning and development strategy for East Dunbartonshire.



The Scottish Government, through *Planning Circular 6/2013: Development Planning*, states that LDP consultations are carried out in accordance with the following requirements:

- In the early stages of the LDP process, the planning authority should actively involve a wide range of stakeholders in identifying the big issues/ challenges facing the plan and broadly what the different options to address these issues are.
- At the Main Issues Report stage the engagement should be focussed around the Council's preferred option(s) and reasonable alternatives for responding to the issues and challenges identified during the early engagement.

- At the Proposed Plan stage the character of engagement will change again: the authority will have reached a settled view, and the emphasis should be on providing information and facilitating representations.
- Consultation should contain a range of innovative techniques and activities for consulting stakeholders, tailored to local circumstances and the issues being dealt within the plan
- Consultation should also include discussions with Scottish Ministers, key agencies and adjoining planning authorities, as early as possible.
- Planning authorities should consider carrying out a 'Call for Sites' prior to preparing the Main Issues Report to allow landowners and prospective developers to put forward potential development sites as early in the process as possible.

The preparation of the East Dunbartonshire Local Development Plan 2 is being undertaken within this context.

2. Consultation Awareness Raising

Effective engagement and consultation with local communities and other interested parties is a key element of the LDP preparation process. We aimed to reach as many people as possible, but also to reach parts of the community that do not always participate in the planning process, or are historically hard to reach. The following key methods were used to publicise the consultation:

- Local press releases
- Social media updates
- Council's website
- Leaflets and posters
- Direct emailing to key partners and community groups
- LDP newsletter
- Information provided to Elected Members for distribution

2.1 Local Press release

A series of press releases were issued containing details of the consultation, upcoming drop-in sessions and closing date reminders. These were published in the Kirkintilloch and Milngavie and Bearsden Heralds.

2.2 Social Media

The Council carried out an extensive promotional campaign through a social media programme. The Council uses Facebook and Twitter accounts to distribute news and this programme allowed frequent updates to be posted regarding this consultation. The updates included: general information on the consultation, details of drop-in sessions held across the authority and reminders of the consultation deadline.

2.3 Council Website

A dedicated consultation webpage was created within the East Dunbartonshire Council website and received a total of 3,323 views. This can still be viewed in the Council's [consultation archive](#).

The webpage include a link to other relevant documents such as the Development Plan Scheme, response forms and the current LDP.

2.4 Information leaflets

The Council distributed approximately 700 information leaflets to libraries, hubs, local shops and other high footfall locations including leisure centres and public halls.

2.5 LDP Newsletter

The Land Planning Policy Team's newsletter was distributed to over 600 recipients throughout the consultation period, with details of how to get involved and information on the overall process of preparing the LDP2. This newsletter is regularly distributed via email and is sent to a wide range of stakeholders including local residents, community groups, key agencies, developers and consultancies. Recent versions of our newsletter can be accessed on the [Council website](#).

2.6 Contact with stakeholders

The Council contacted a large number of stakeholders to raise awareness of the consultation and seek views at this key stage. In addition to distributing our newsletter to individuals, Council officers liaised with key agencies including SEPA, Historic Environment Scotland, Scottish Water, SPT, Transport Scotland and SNH. All Community Councils were invited to a dedicated information session in October 2019, hosted by the Council's Land Planning Policy team.

- **94** likes, shares, comments



- **27** Facebook and Twitter posts

- **782** click-throughs to EDC website



- **238,000** Total Twitter reach



- **43,000** Total Facebook reach



3. Engagement Methods

A range of methods were used to engage with communities and stakeholders during the consultation. This included:

- Questionnaire
- Community drop-in sessions
- Community Council and Community Group meeting
- Engagement with key stakeholders
- Secondary Schools event

The following section summarises the different ways in which people could respond and/ or take part.

3.1 Questionnaire

The questionnaire asked members of the public and other stakeholders to indicate whether they agreed with the Council's preferred option for each identified issue. It was designed to be as user friendly as possible and helped officers collate information in a consistent manner that allowed for easier identification of key trends and areas of concern (see extract below).

Separate questionnaires were created for each of the seven community areas, giving people the opportunity to focus on their own localities. In addition, a policy-focused questionnaire was available, relating to area wide policies on the following themes:

- Housing
- Town Centres
- Climate Change
- Business and Employment
- Tourism and the Visitor Economy
- Historic Environment
- General Comments

The questionnaire was available online and this was promoted as the preferred method of submission, however paper copies were available in libraries and Hubs for those who could not access the online version. The total number of questionnaire responses relating to each community area are shown in the table below:

Area	Number
Bearsden	68
Bishopbriggs	11
Kirkintilloch, Lenzie and Waterside	22
Milngavie	89
Lennoxton, Milton of Campsie, Haughhead and Clachan of Campsie	33
Torrance	10
Twechar	0
Main Policies	23
TOTAL	256

The responses to the various questionnaires are summarised in section 4.

Total questionnaire responses: 256

3.2 Emails and Hard Copies

A significant number of people submitted their comments in email format, while a smaller number submitted their response in hard copy by post. Of the email responses, a large number related to concerns over the status of greenbelt land around Bearsden and Milngavie, in particular the areas known locally as ‘Craigdhu Wedge’ and ‘Douglaston’. A total of 393 emails and 19 letters on this issue were received during the consultation period. Further details can be found in the ‘Key Findings’ section below, under the Bearsden and Milngavie community area sections in particular. All emails and hard copies were recorded as formal responses and were taken into account as part of the consultation.

Total Postal responses: 28

Total Email responses: 526

3.3 Drop-In Sessions

Displays and drop-in sessions in places such as community hubs and local community centres provided an opportunity for people to learn more about the consultation and to give their opinions on the MIR options in an informal setting. In addition, the sessions provided an opportunity for anyone to ask discuss the MIR (or associated documentation) with planning officers.

The drop-in session format was considered as the most appropriate method given the nature of the MIR consultation document and in giving flexibility for attendees when and for how long to attend. However, the drop-in events were designed to incorporate elements of workshop exercises, as carried out at the early engagement stage. This was achieved through a series of posters that provided the following:

- General information regarding the purpose of the MIR and the wider LDP process.
- An overview of information and statistics for each community and policy area.
- Summarised descriptions of the preferred options for communities and policies, including boxes to agree or disagree with the options presented.

Full copies of the MIR and associated documents were also available for stakeholders to study.

The drop-in sessions were held at the following locations:

Location	Date	Time	Approximate Number of participants
Milton of Campsie Parish Church	Friday 25 th October 2019	3pm - 6pm	18
The Fraser Centre, Milngavie	Monday 28 th October 2019	3pm – 7pm	68
Twechar Healthy Living & Enterprise Centre	Wednesday 30 th October 2019	3pm – 6pm	3
Caldwell Halls, Torrance	Wednesday 13 th November 2019	4pm – 7pm	25
Glazert Country House Hotel, Lennoxton	Monday 18 th November 2019	3pm – 7pm	13
Kirkintilloch Leisure Centre	Wednesday 20 th November 2019	3pm – 7pm	16
Bearsden Community Hub	Tuesday 26 th November 2019	3pm – 7pm	97
Bishopbriggs War Memorial Hall	Thursday 28 th November 2019	3pm – 7pm	13
			Total: 253

3.4 Community Council and Groups Session

Community Councils and other community groups play a key role in the LDP preparation process and planning system in general. These bodies are a vital link between the Council and local communities. The Council conducted an information session with community groups on 17 October 2019 at the War Memorial Hall in Bishopbriggs. The Land Planning Policy Team invited all Community Councils (using the contact details on the Council's website) and other community groups to attend the session. The main purpose was to help promote the MIR by explaining the content of the document and the wider process to community groups, at the opening of the engagement period, and encouraging them to promote the consultation and garner opinion from their respective communities. The session was principally aimed at providing information and all groups were encouraged to make submissions to the MIR and attend the drop-in sessions.

The following community councils and groups made representation to the MIR:

Community Council or Group	Attended Session	Submitted Response?
Baldernock Community Council		✓
Bearsden North Community Council		✓
Bishopbriggs Community Council	✓	✓
Kirkintilloch Community Council		✓
Lenzie Community Council		✓
Mains Estate Residents Association	✓	✓
Milngavie Community Council		✓
Milngavie and Bearsden Greenbelt Action Group	✓	
Milton of Campsie Community Council	✓	✓
Waterside Community Council	✓	✓
Woodhill Resident's Group	✓	
Mosshead Resident's Association		✓
Burnbrae Residents Association		✓
Milton of Campsie Greenbelt Preservation Group	✓	✓

3.5 Schools Event

Following on from the 'Planning Conference' style event that was held with schools as part of the early engagement in early 2019, the Land Planning Policy team hosted a further event in Turnbull High School in October 2019, this time focussing on the Main Issues Report. 19 pupils from Turnbull High School (Bishopbriggs) and Douglas Academy (Milngavie) took part in the session, during which they participated in a number of exercises designed to explore some of the topics contained within the MIR and for them to share their opinions about the Council's preferred options. As this was one of the first engagement events scheduled for the MIR stage it also presented an opportunity to test the approach of using interactive posters for the drop-in sessions. The outcomes of this event are summarised within the relevant sections of the key findings section.

The intention is that further follow-up events will be organised at subsequent key stages in the process. Whilst it has been particularly valuable to engage school pupils so far, it is very important that this engagement continues and that feedback on the process is relayed back to the schools. This will not only allow the young people to continue to participate in the planning of their area but also provides the opportunity to gain skills in discussion, debate, active citizenship and networking, and additionally may inform future decisions about potential careers.

Where

Turnbull High School, Assembly Area

When

Thursday 23 October 2019

Participating Schools (S1 – S3)

Turnbull High (12 pupils)

Douglas Academy (7 pupils)

3.6 Equalities Groups

In line with the Council's Consultation and Engagement Strategy, our approach to engagement was based on the key principles of fairness and equality, and the importance of reaching out to people who find it difficult to get involved (for example, because of age, poverty, disability or other support needs). We aimed to ensure that the consultation methods used met the needs and expectations of everyone who wished to take part. As such, we worked closely with the Council's Community Planning & Partnerships team to engage with the East Dunbartonshire *Equality Engagement Group*. This includes a wide range of representatives from protected characteristic groups, including:

- Kirkintilloch & District Seniors Forum
- East Dunbartonshire Citizens Advice Bureau
- East Dunbartonshire Access Panel / East Dunbartonshire Visually Impaired People's Forum
- New College Lanarkshire
- LGBT Youth Scotland
- East Dunbartonshire Voluntary Action
- Health and Social Care Partnership
- East Dunbartonshire Ethnic Minority Forum
- Kirkintilloch Baptist Church
- Ceartas Advocacy Service
- Carer's Link
- Scottish Care
- East Dunbartonshire Leisure and Culture Trust
- Skills Development Scotland
- East Dunbartonshire Association for Mental Health

In addition to this, we made specific efforts to engage with Gypsy/ Traveller representatives in relation to a particular site (see Minor Areas of Change – Policy 6). All activities were held in accessible Council venues, including Community Hubs and halls.

3.7 Key Agencies and Organisations

Close working with key agencies is crucial in ensuring that the plan will be aligned with the key priorities of each agencies’ work. Officers met with or engaged with the following key agencies and organisations to discuss the Main Issues Report and ensure that the preferred options align with the individual objectives of each organisation:

- Forestry and Land Scotland
- Glasgow Airport
- Historic Environment Scotland
- Homes for Scotland
- Scottish Canals
- Scottish Enterprise
- Scottish Forestry
- Scottish Water
- SEPA
- SNH
- SPT
- The Coal Authority
- Transport Scotland
- Visit Scotland



3.8 Community Planning Partners

We have been working closely with Community Planning Partners from the outset of the LDP 2 process, in order to ensure the LDP2 is in line with the Local Outcomes Improvement Plan. Such collaboration also ensures that the Locality/Place Plans for those areas which experience most inequality are fully integrated into the policy preparation process. Regular updates on the LDP2 process are also provided at the Community Planning Executive Group, including a summary and presentation of the Main Issues Report. Additionally, a series of meetings were held with East Dunbartonshire Council departments and Health and Social Care Partnership to develop the content of the Main Issues Report in line with the Early Engagement findings. Further meetings will be held throughout the LDP2 process as required.



4. Key Findings

The following pages provide the findings from the range of consultation methods by topic, as outlined below.

Objectives	What should the overall objectives for LDP2 be?
Community Area	Bearsden
Community Area	Bishopbriggs
Community Area	Kirkintilloch, Lenzie and Waterside
Community Area	Lennoxton, Milton of Campsie, Haughhead and Clachan of Campsie
Community Area	Milngavie
Community Area	Torrance and Baldernock
Community Area	Twechar
Policy Theme	How can we address housing need in the right location?
Policy Theme	How can we create vibrant and successful Town Centres?
Policy Theme	How can we best prepare for the impacts of climate change?
Policy Theme	How best can we ensure land is available for business development?
Policy Theme	Can we be more proactive in developing our visitor economy?
Policy Theme	Should we carry out a review of historic environment designations?
Other	Minor areas of change - Comments
Other	What is not changing? - Comments
Other	General Comments

Objectives

Community Area/Policy Theme	Objectives
Elements of the engagement included:	<ul style="list-style-type: none"> • Questionnaire • Drop In Session • Email responses
List of Organisation(s) commenting on this topic	
<ul style="list-style-type: none"> • Archibald Young Ltd • Avison Young c/o Aldi Stores • Barton Willmore c/o Cala Homes • Barton Willmore, for Bellway Homes • Bidwells • Clarendon Planning & Development for Barratt Homes • Gladman Developments Ltd • Go Bike • Historic Scotland • Homes for Scotland • Icen Projects c/o Balfour Beatty Homes • Icen Projects c/o Mactaggart and Mickel Homes • Lichfields for Extralifestyle Ltd • Mains Estate Residents Association (MERA) • McEwan Hainey Planning & Development for James and Robert Rankin • Milngavie Community Council • Network Rail • NHS Greater Glasgow and Clyde (NHSGCC) • Paths for All • Persimmon Homes • RFA Consultants • Ryden c/o Stewart Milne Homes • Scottish Environment Protection Agency (SEPA) • Scottish Natural Heritage (SNH) • Strathclyde Partnership for Transport (SPT) • Stirling Council 	
Planning authority's summary of comments:	
Issue 1 - What should the overall objectives for LDP2 be?	
<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Create a new set of objectives that reflect the outcomes of early community engagement and more effectively support national, regional and local outcomes.	2. Create a set of objectives that are focused on delivering the key themes and outcomes set out in the Local Outcomes Improvement Plan and Strategic Development Plan

Community Area/Policy Theme	Objectives
<p><i>Summary of comments from Individuals (ii)</i></p> <ul style="list-style-type: none"> • Support the seven overall objectives of the Plan and trust that these can be implemented without detriment to current communities and services. • The objectives should include support housing in the countryside - there should be a policy that supports small scale development for housing in the countryside to reflect national guidance and Scottish Government advice <p><i>Summary of comments from groups and organisations</i></p> <p>Archibald Young Ltd (LDP13.25 Milton Rd) - The Council’s preferred option identifies key aims, namely to support the growth and diversification of businesses and attract employers to the local area and to support the redevelopment or reuse of brownfield land within sustainable locations in the urban area. These key aims will help facilitate the continued regeneration of urban brownfield areas, typified by the subject site and its general location, and therefore should be supported. However, to provide further confidence to the development sector, it would also be preferable that the Local Development Plan policy was explicit in that the Council would support employment generating uses outwith Class 4, 5 and 6. Developers face a number of challenges and removing unnecessary barriers that prevent development will encourage developers to progress with their proposals. Where the planning policy allocation does not specifically allow for a specific use, a developer will likely be discouraged from progressing that development.</p> <p>RFA Consultants (For Boghead Rd) This issue questions the overarching objectives of the Local Development Plan (LDP) with which our client generally agrees. We support the reasonable alternative option which allows the LDP to ‘Deliver good quality homes that meet local needs, including a range of tenures and house types through modest growth’.</p> <p>Our proposal includes a housing element which fully meets this objective and addresses the Housing Needs and Demand Assessment as well as the Housing Land Supply Target and Local Housing Strategy. It has a mix of market, affordable and assisted living dwellings as well as a Care Home (Class 8) to meet local needs. Accordingly, it is compliant with LDP Policy 6 Specialist Housing.</p> <p>The Reasonable Alternative to Issue 1 in the MIR goes on to state that, “These objectives are aligned fully, or in part, with the strategic objectives of the Clydeplan SDP and relevant LOIP outcomes. However, they do not reflect all of the key themes and requirements that are emerging in terms of national planning policy and local priorities’’. We are in agreement with this statement particularly in relation to community recreational provision.</p> <p>The preferred option is to create a new set of policy objectives that reflect the outcomes of early engagement and more efficiently support national, regional and local outcomes. One of these objectives is to create places which improve health and wellbeing through a good quality natural and built environment in our towns and villages, with opportunities for social interaction and recreation. The proposed development by Bees Nees embodies this principle as it provides a range of different sporting facilities.</p> <p>Gladman Developments (various sites) - We do not agree with the overall objectives for LDP2, in particular in relation to housing. The Preferred and Alternative options identify the delivery of good quality homes to</p>	

Community Area/Policy Theme	Objectives
	<p>meet local needs which we support, however the MIR does not appear to support this throughout. The differences between the Preferred and Alternative options appear to imply that by providing more housing through the Alternative option, it will be less sustainable than the Preferred option.</p> <p>We do not agree with this suggestion, nor is it supported by Clydeplan which emphasises the crucial role housing plays in the overall economic, social and environmental success of a city/region. Clydeplan also outlines the benefits the creation of new homes will have through generating further employment and sustaining and enhancing local community facilities such as schools and shops.</p> <p>The MIR implies that new housing on any greenfield or greenbelt site is inherently unsustainable which is not an accurate or reasonable assumption. We agree that housing sites should be coming forward within sustainable locations, of which multiple greenfield and greenbelt sites should be considered as such, including those promoted by Gladman.</p> <p>While Clydeplan supports prioritising the delivery of brownfield land, it also supports the delivery of housing on greenfield/greenbelt sites in suitable locations when there is a housing need. This is the case in East Dunbartonshire. We therefore recommend that the objectives and strategy of the Proposed Plan must focus on the delivery of sustainable sites for housing, but which have demonstrated that they are effective and can be delivered, on brownfield and greenfield sites.</p> <p>Avison Young c/o Aldi Stores - Aldi welcomes the decision to support the growth and diversification of businesses and attract employers to the local area and Aldi looks forward to working with the Council in order to bring more of its stores to the region which will lead to the creation of jobs in the area. Aldi also support the ambitions to promote sustainable development, as part of a low carbon economy, which is resource efficient and adaptable to climate change.</p> <p>Bidwells - Objective 6 of the preferred options should be extended to include support for the reuse of all brownfield land, including the potential for single house developments on brownfield sites within the green belt which would accord with Scottish Planning Policy where the circumstances for development outwith settlements require to be clearly set out. Policy 6 – ‘Creating Inclusive and Sustainable Communities’ in the current LDP allows scope for single dwellings to be approved in the green belt but only where they are based on an operational need for agricultural workers or for the replacement of existing dwellings. Within LDP2 and in addition to these two current categories, support should also be given for single house developments in the green belt where it would involve redevelopment of redundant, derelict or contaminated brownfield land. Therefore the proposed amendment to the definition of brownfield land in the LDP 2 glossary, to state that brownfield sites in the greenbelt should not be presumed to be suitable for development, is not supported as such sites can help to meet the overall objectives and environmental improvements. It is also not supported by SPP.</p> <p>Milngavie Community Council - MCC strongly supports the objectives listed, and trust that the Council will apply each one of them in all its decision making.</p> <p>MERA – Agree that brownfield sites should be prioritised and greenbelt protected. Support use of former St Joseph’s primary for a health hub and safeguarding of this site for such a use.</p>

Community Area/Policy Theme	Objectives
	<p>Lichfields for Extralifestyle Ltd (S346 Kirkintilloch Gateway) - The objectives set out in the preferred option align with national policy and guidance contained in NPF3 and SPP respectively and with regional policy in Clydeplan and are therefore supported.</p> <p>Ryden c/o Stewart Milne Homes – Agree with objectives but note that issues 3 and 34 do not align with these.</p> <p>Clarendon Planning & Development for Barratt Homes (Kirkintilloch East) - At a national level, SPP and NPF3 outcomes cover four broad areas including supporting ‘sustainable economic growth and regeneration and the creation of well designed, sustainable places’. This promotes a broad interpretation of sustainable development and infers a reality that sustainable development can be on both brownfield and greenfield sites, depending on a range of factors including transport accessibility. This reflects the need for Scotland to support sustainable growth and significant levels of new housing to accommodate demand.</p> <p>At a strategic level, Clydeplan’s focus is on a ‘compact city model’ with development directed towards key regeneration areas and long-standing Community Growth Areas. The greater focus on brownfield development is related to the characteristics of the region and its industrialised past but should not preclude from greenfield development in the right locations if housing demand is to be met. It is noted that the ‘preferred’ MIR objectives reflect the broader national policy approach and the ‘alternative’ objectives reflect the narrower strategic approach in relation to development direction. As such, the preferred option is supported by Barratt Homes which should allow for allocation of sufficient housing land including well considered urban growth of East Dunbartonshire’s towns over the plan period. Page 11 of the MIR summarises the Spatial Strategy approach and notes that this will reflect the preferred LDP objectives.</p> <p>However, the approach set out focuses on regeneration and protection of the Green Belt, noting that there are ‘limited opportunities for expansion’ of East Dunbartonshire’s towns without harming its landscape setting. This approach would seem to fit more with the Clydeplan approach noted within the MIR ‘alternative’ objectives and not the wider definition of sustainable development growth. Redevelopment of urban areas is clearly a key planning requirement, but the Spatial Strategy should not preclude from urban expansion (which may require to be in Green Belt locations) in the right locations, if demonstrated to be sustainable placemaking. It is not always economically viable to develop brownfield land due to physical constraints and it should be recognised that greenfield locations can be sustainably developed taking into consideration sustainable transport options and landscape and ecological enhancements. Figure 2 (extracted from Page 11 of the MIR) illustrates the importance of Kirkintilloch as the focus of existing homes and population. The town is ranked first in both respects amongst East Dunbartonshire’s seven communities. The need to ensure the future growth of Kirkintilloch including opportunities for new homes is clear.</p> <p>McEwan Hainey Planning & Development for James and Robert Rankin (Badenheath) – The Council’s preferred option identifies key aims, namely to support the growth and diversification of businesses; to attract employers to the local area; and to promote sustainable development as part of a low carbon economy which is resource efficient and adaptable to climate change. These key aims will help facilitate the continued development of East Dunbartonshire’s economy and should therefore be supported.</p> <p>However, to demonstrate that East Dunbartonshire Council is open for business to both potential inward investors/ established local businesses (who may wish to relocate) appropriate sites require to be identified for development, providing further confidence to the development industry.</p>

Community Area/Policy Theme	Objectives
	<p>Iceni Projects c/o Balfour Beatty Homes and Mactaggart & Mickel Homes - Support the reasonable alternative as it complies with the strategic objectives of the SDP.</p> <p>Persimmon Homes (Various Sites) - In identifying land to meet the HLR the Council focus their development strategy on brownfield sites stating that the development of greenfield sites will: “compromise the broader city region strategy of focusing on regeneration, sustainable development and prioritising the development of brownfield land over greenfield where at all possible. Therefore, the risks to the city region strategy and environmental protection are considered to outweigh the benefits of this option.”</p> <p>It should be noted that the Clydeplan strategy for enabling the provision of new homes does not specifically preclude the use of greenfield sites for housing, specifically it notes that: “The strategy also includes a range of large scale planned greenfield sites including the Community Growth Areas, released through earlier plans and either still under development or still to commence, as well as a range and choice of other greenfield and brownfield sites.” (Para. 6.25).</p> <p>Policy 8 of Clydeplan also goes on to cover housing land requirement and steps to be taken where a shortfall in the five year housing land supply arises. This allows for planning permission being granted for housing developments on “greenfield or brownfield” sites. The consideration of greenfield sites does not therefore rely on all brownfield land in the city region having been exhausted. To meet the demand and need for new homes in East Dunbartonshire greenfield sites will require to be allocated.</p> <p>Homes for Scotland - Homes for Scotland does not support the wording of the preferred option or the reasonable alternative options as neither includes a specific objective on meeting housing need and demand in full. There appears to be a false distinction drawn between the Preferred Option and the Reasonable Alternative Option in regard to the provision of housing. It is implied that the provision of more housing in the Reasonable Alternative is less sustainable than providing fewer houses is. We do not agree with. As explained in Clydeplan paragraph 6.22, “Housing plays a fundamental role in the overall economic, social and environmental success of the city region. Housebuilding makes an important contribution to the city region’s economy and as well as creating new homes, delivers wider societal benefits through the generation of employment, and by sustaining and enhancing local community facilities such as schools, shops, recreation facilities and open spaces.”</p> <p>The MIR contains a number of references implying that new housing on greenfield sites is inherently unsustainable, which we do not consider to be a reasonable or justified view. Our concern is that this misconception has underpinned the strategy promoted in the MIR. Homes for Scotland members are active on brownfield sites across the region and housing development makes an important contribution to the regeneration of brownfield land. However, a balanced approach is necessary. Not all brownfield sites are suitable for housing development and the development of some is unviable. Similarly, some greenfield sites will be more sustainably located in relation to transport connections and community facilities than brownfield sites.</p> <p>NHS Greater Glasgow and Clyde (NHSGCC) - NHSGCC support all of the overall objectives of LDP 2.</p> <p>Barton Willmore c/o Cala Homes - CALA generally support the preferred option for the overall objectives of the Local Development Plan.</p>

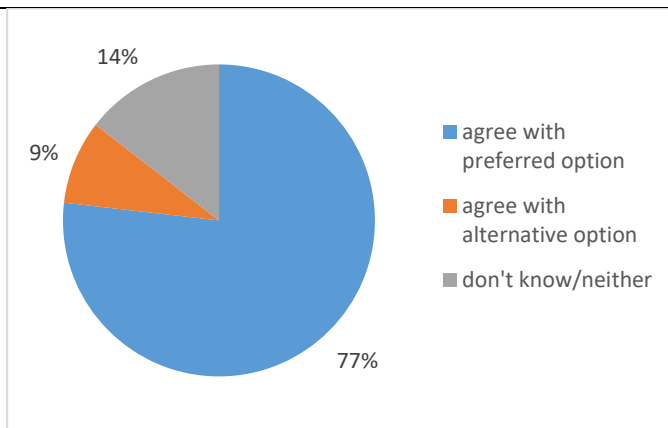
Community Area/Policy Theme	Objectives
	<p>Go Bike – Agree with objectives 3 & 7 with but we see little evidence of such places within East Dunbartonshire currently. We wish to see a network of cycle routes, between significant centres in East Dunbartonshire and neighbouring places such as Glasgow, building on the success of the very limited Bears Way cycle route. Within local centres we wish to see the ethos of the Scottish Government document “Designing Streets” put into practice.</p> <p>Stirling Council - Support the preferred option.</p> <p>Paths for All - Agree with preferred option. Recommend that promotion of walking should be emphasised to align it with the National Walking Strategy, the Cycling Action Plan for Scotland and the Long-term Vision for Active Travel in Scotland. We therefore welcome the inclusion of the objective: Create places that are safe, easy to move around and are well connected by walking, cycling and public transport. The National Walking Strategy has three strategic aims:</p> <ul style="list-style-type: none"> • Create a culture of walking • Better walking environments throughout Scotland • Ensure easy, convenient independent mobility for all <p>In particular the NWS makes the links between active travel, health and the environment. A number of specific actions contained in the action plan have a planning focus. Given the climate emergency we welcome the objective: Promote sustainable development, as part of a low carbon economy, which is resource efficient and adaptable to climate change.</p> <p>We also welcome the objective: Improve health and wellbeing through a good quality natural and built environment in our towns and villages, with opportunities for social interaction and recreation. This recognises the importance of place for health and well-being.</p> <p>SEPA - We support the objectives set out in the Preferred Option. They are sustainable, adopt a place-making approach and address climate change. Ideally we would like to see additional mention of improvements in blue/green infrastructure, improvement in air quality and avoidance of flood risk as being part and parcel of several of your proposed objectives such as promotion of sustainable development, creation of safe, well-connected places, and improving health and wellbeing, although we appreciate these are picked up under specific policies.</p> <p>Network Rail – Agree with the preferred option. Network Rail welcomes the objectives set out for the new LDP2. The provision of a safe, modern and efficient railway service will contribute towards sustainability goals, creating places that are well-connected and supporting the growth of businesses and new employers to East Dunbartonshire.</p> <p>We also welcome the new aligning the objectives with key national outcomes. It is the experience of Network Rail that the effective planning and delivery of railway infrastructure rarely fits neatly into either a local or regional area scale. Improvements or enhancements to the rail network are most appropriately planned and delivered on a ‘rail corridor’ or route basis as changes to the rail infrastructure in one place may impact on the operation of the wider rail network and will often benefit places geographically remote from the physical location of the improved infrastructure.</p>

Community Area/Policy Theme	Objectives
<p>Historic Scotland - We are content with the 7 key objectives provided in the preferred option and welcome that consideration is given to the built environment within the objectives. You may wish to consider whether broadening the objective around health and wellbeing to refer to the historic environment as a whole rather than the built environment would be beneficial.</p> <p>SPT – Agree with the preferred option. The proposed objectives support local and national policy priorities. The key issues and objectives emerging from the development of the new Regional Transport Strategy also support these.</p> <p>Barton Willmore c/o Bellway Homes - Bellway generally agree with the overall objectives of LDP2. Notwithstanding that, we consider that a more progressive approach to housing land delivery should be included.</p> <p>SNH - We support the creation of a new set of objectives for the LDP that reflect the findings of early engagement and which more effectively support national, regional and local outcomes. We highlight in particular, our support for the focus and value attributed to the natural heritage, the creation of successful well connected places by active and public transport, sustainable development as part of a low carbon economy and the reuse /redevelopment of brownfield land in sustainable locations within the urban area or compatible with a green belt use.</p> <p>We also encourage maintaining a ‘design-led’ approach to development and the importance of the provision and enhancement of multi-functional green networks in good place-making as advocated by LDP 1.</p>	
<p>Planning Authority response</p>	
<p>The Proposed Plan has been prepared taking into account the responses received on the following issues.</p> <p>Issue 2 – 1 – What should the overall objectives for LDP2 be?</p> <p>In the main the responses supported the preferred approach, of including objectives that reflect the outcomes of early community engagement and more effectively support national, regional and local outcomes, policy and strategies.</p> <p>A few responses asked for amendments to the detailed wording of the objectives however it is considered that in the main the objectives are supported by policies, which address these aspects. Amendments that would help clarify the scope of the objective of improved health and wellbeing are to specifically refer to placemaking and the historic environment. This should therefore be included, see conclusion below. One comment would like reference to the green network in the objectives. However this policy area addresses a range of objectives and is therefore more appropriately identified in the East Dunbartonshire Development Strategy and policies.</p> <p>Whilst some support was expressed for the alternative option for a housing objective, it is not agreed that any responses received provide a rationale for pursuing the alternative option. In addition some responses did not agree with either of the options for the housing objective and would like it to support the release of more green field sites. However the preferred option better reflects the Clydeplan spatial development</p>	

Community Area/Policy Theme	Objectives
	<p>strategy of a compact city region and regeneration of key brownfield sites in the Strategic Development Plan area as well as the East Dunbartonshire Development Strategy. One comment asked for the housing objective to support single house development on brownfield sites in the green belt, however this is contrary to Scottish Planning Policy and Clydeplan policy. A number of comments also referred to the objectives as a justification for allocating their suggested site however the response to specific sites is addressed in the sections for different communities below.</p> <p><i>Conclusion: Implement preferred option. Make minor amendments to the second objective to specifically refer to placemaking and the historic environment.</i></p> <p>The Proposed Plan is subject to consultation with all representations being considered by a Reporter on behalf of Scottish Ministers, this provides a final opportunity for comments.</p>

Bearsden

Community Area/Policy Theme	Bearsden	
Elements of the engagement included:	<ul style="list-style-type: none"> • Questionnaire • Drop In Session • Hard copy paper responses 	
List of Organisation(s) commenting on this topic		
<ul style="list-style-type: none"> • Bearsden North Community Council (BNCC) • Burnbrae Resident's Association (BRA) • Gladman Developments • Historic Scotland • Icen Projects c/o Balfour Beatty Homes • Jigsaw Planning • Jo Swinson (MP at time of consultation) • Keppie c/o Robertson Homes • Mains Estate Residents Association (MERA) • Montagu Evans c/o Caledonian Properties & Mactaggart and Mickel Homes • Montagu Evans c/o John Hogg Pension Trust • Mosshead Resident's Association (MRA) • Network Rail • NHS Greater Glasgow & Clyde (NHSGGC) • Ryden c/o Stewart Milne Homes • Scottish Water • Scottish Environment Protection Agency (SEPA) • Scottish Natural Heritage (SNH) • Strathclyde Partnership for Transport (SPT) • Transport Scotland 		
Planning authority's summary of the representation(s):		
<p><u>Issue 2 – What is the most appropriate way of integrating the Bearsden Town Centre Strategy in LDP 2?</u></p>		
<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>	
1. Incorporate all actions identified in the Bearsden town centre strategy within LDP 2	2. Retain town centre strategy as planning guidance and cross refer where appropriate	



Agree with preferred option – 53
 Agree with alternative option – 6
 Other / Don't Know - 10

Summary of comments from individuals:

The preferred option was overwhelmingly supported. A small number of related comments and suggestions on the town centre were also made, as set out below:

- A strategy for the town centre must form an integral part of the overall plans for the area
- Very important to connect station with town centre and improve public/active transport and travel options overall
- No need to develop Bearsden town centre any further as it is a dormitory

Summary of responses from groups and organisations:

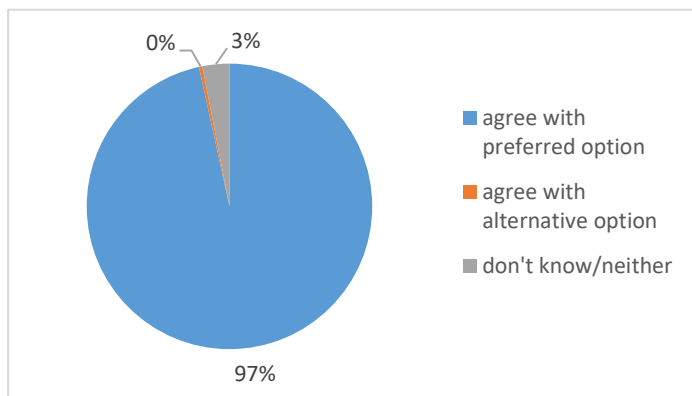
SPT – Agree with the preferred option. Omitting the strategy actions from LDP2 lessens their status.

Bearsden North Community Council - Preferred option provides the strongest protection for the town centre

Mosshead Resident’s Association – Concern that Bearsden has the highest proportion of vacant shop units in East Dunbartonshire. To improve vitality and viability, short stay parking charges should be revoked and proposals for new meters withdrawn.

Issue 3 – Where should new housing in Bearsden be located?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
<p>1. Allocate the sites from the preferred housing package (see Issue 34) located within Bearsden (in addition to the sites within the current LDP and/or with planning consent):</p> <ul style="list-style-type: none"> • S311, 190-196 Milngavie Rd (Housing for older people) 20 – 30 homes • S360 Nithsdale Crescent (100% Affordable Housing) 27 homes 	<p>2. Allocate the sites from the alternative housing package (see Issue 34), none of which are located in Bearsden.</p>



Agree with preferred option – 507
 Agree with alternative option – 2
 Other / Don't Know – 16

Summary of comments from individuals:

The Council received a large number of responses in support of the Council's preferred option. In particular, most responses expressed concern about the potential impact of various proposed sites submitted at the 'call-for-sites' stage, including the area known locally as 'Craigdhu Wedge'. These mainly related to sites **S25, S300, S301, S302**. For the Bearsden and Milngavie area, a total of 393 emails were received, together with 151 completed questionnaires. In addition, 98 people attended our consultation 'drop-in' event in Bearsden Hub, during which a large number of comments were made via posters and discussions with officers. Taken together, these concerns covered a wide range of issues and broadly speaking related to one or more of the following:

- Protection of the greenbelt and importance of preserving open space and recreation land
- The area cannot accommodate more housing
- New development would have an unacceptable impact on road traffic and local infrastructure
- Increased pressure on local services and community facilities including GP surgeries, schools, nurseries and other health facilities
- Lack of water and waste water infrastructure capacity
- Negative impact on local air quality
- Loss of agricultural land
- Negative impact on woodland, wildlife habitats and biodiversity
- New development would lead to increased carbon emissions and would be incompatible with climate change targets
- New development would increase the risk of flooding
- Important to prevent the coalescence of Bearsden and Milngavie, as they are two distinct communities
- New housing should only occur on brownfield land, including refurbishment of older and inefficient homes

A number of comments disagreed with the preferred option on the basis that there is a lack of housing for the elderly in the area. It was suggested that in order to get the housing stock moving and to allow more people to move into the areas, more the 20 - 30 units are necessary.

A very small number of responses raised concerns over the two preferred option sites (S311 and S360), on the basis that parking is already very difficult and the area of open space is well used.

Summary of responses from groups and organisations:

Note: New or updated information received from developers and key agencies on individual sites has been incorporated into the relevant site assessment, which have been updated separately.

Ryden c/o Stewart Milne Homes (S2 & S225 Langfaulds) – Disagree with preferred option. The land at Langfaulds, Baljaffray Road, Bearsden represents an appropriate opportunity to deliver sustainable residential development in Bearsden. The scale and nature of the site and the surrounding land within SMH’s control also means that all relevant and required landscaping, amenity space, and infrastructure (including SuDS) can be accommodated. It can be sensitively accommodated to avoid an adverse impact on the Buffer Zone and setting of the Antonine Wall. The proposed sites has few of the constraints which would normally be found in proposed residential allocations. In particular, the site itself is relatively easy to develop, direct access is possible, and a positive integration with the existing urban and residential area is deliverable. SMH believes that there is a sound case in favour of allocating the site for housing in the emerging LDP2 as it is effective and capable of delivering up to 215 new homes in Bearsden in the next 5 to 10 years.

Keppie c/o Robertson Homes (S207 Boclair Farm) – Disagree with preferred option. This site should be released will assist in providing a range and choice of location for new housing in terms of size and location across Bearsden and will provide further flexibility and generosity to the housing land supply. Such an approach is preferable to an overreliance on fewer, and windfall housing locations in Bearsden. Suggest that site assessment scoring is inaccurate and alternative scoring provided.

Jigsaw Planning (S220 Edgehill Road) – Disagree with preferred option and believe site S220 is suitable for development. The site is fully effective and could be delivered through the lifespan of Local Development Plan 2. The proposal represents infill development which fulfils the sustainable requirements for new development in strategic policy and local policy. Furthermore, this is a highly accessible and sustainable location that can provide an appropriate housing development.

Gladman Developments (S301 East of Stockiemuir Road) - Disagree with preferred option and consider that this site is suitable for development for the following reasons:

- there is a shortfall within the housing sub-market area
- can deliver up to 50 family homes, including 25% affordable
- site is free from technical constraints
- would provide extensive amenity/open space including enhanced pedestrian links to core path network
- will deliver various socio-economic benefits

Iceni Projects c/o Balfour Beatty Homes (S305 Kessington Phase 2) - Disagree with both preferred and alternative options and consider that this site is suitable for housing development for the following reasons:

- there continues to be an underlying issues with affordable housing in EDC and the need for family housing and those wishing to downsize.
- allows for the creation of a long term, sustainable and defensible green belt boundary
- there is little or no green belt function
- there would be local economic benefits
- site forms the second phase of recent Kessington Gate development and site would link into these transport and access arrangements. No infrastructure constraints.

Montagu Evans c/o Caledonian Properties & Mactaggart and Mickel Homes (S310 Millichen Road) – Disagree with the preferred and alternative options for the following reasons:

- Does not address the housing shortfall in EDC (see issue 34)
- Provides a range of house types and tenures including affordable housing, homes for downsizing and homes for the elderly
- Meets the aims of Clydeplan as there is insufficient brownfield land in the area to meet the scale of demand
- Supports sustainable economic growth

Montagu Evans c/o John Hogg Pension Trust (S311 190-196 Milngavie Road)

We support Issue 3 of the EDC Main Issues Report which identifies the retail parade at 190-196 Milngavie Road as a residential development opportunity in the emerging LDP. We do however note that the site is capable of accommodating a flatted development for occupation either as housing for older people or for sale on the open market. We therefore request that the emerging policy is updated to reflect this range of occupancy.

MERA: Supports the preferred option

NHS Greater Glasgow & Clyde (NHSGGC) - NHSGGC do not have a specific view on the proposals within issue 3. As has been referred to in the site assessment document, there is a lack of healthcare capacity within the West Locality (Bearsden & Milngavie) of East Dunbartonshire and therefore, there is a need to review the potential need for additional health related facilities, if this issue is taken forward. NHSGGC continue to support the need to further and detailed engagement in relation to the potential impact both existing and new developments may have on the delivery of healthcare.

Jo Swinson (MP at time of consultation) - I am delighted to see that the Council's preferred options for development do not include the, currently protected, greenbelt between Milngavie and Bearsden. That is, to be clear, the piece of land bounded by the Mains Estate, Prestonfield, the wedge, Mosshead and North Baljaffray which includes South Mains Farm.

Local residents continue to have serious concerns about developing this land; concerns which I share. It would pose a risk to wildlife, and farming, and place additional strain on public services which are already struggling. What's more, developing this land would lead to increased congestion and pollution in an area that is already an Air Quality Management Area.

I am aware that developers are still extremely interested in this area of land, therefore, I strongly and wholeheartedly support the Council's plans to safeguard the Milngavie and Bearsden greenbelt; and, indeed, the Council's intention not to build on any greenbelt areas across East Dunbartonshire.

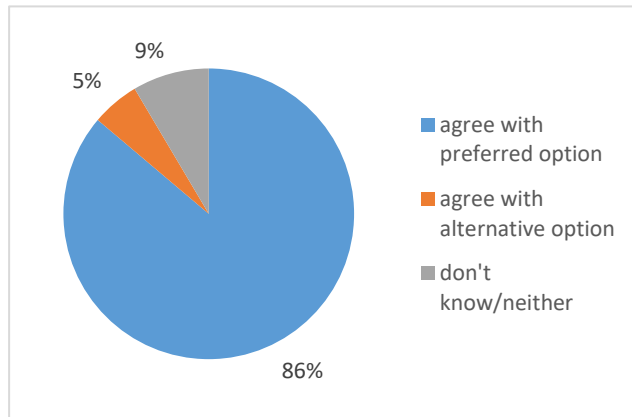
Scottish Water - recommend that the Developers submit a Pre Development Enquiry (PDE) Form, which can be found on our website (www.scottishwater.co.uk) and is free to submit to our Development Operations Team. The completed PDE will allow us to conduct a tailored assessment of the development and to ascertain what (if any) impact the developments have on the local network.

SEPA - We are pleased to see in the Preferred Option, which we support, the focus on brownfield opportunities and regeneration of vacant land. Nationally, SEPA has engaged with planning authorities, the Land Commission and other partners in order to see renewed impetus in transforming Scotland's vacant and derelict land. We strongly support East Dunbartonshire's intentions in this area, provided, of course, other policy drivers such as avoidance of flood risk are met.

SPT – Agree with the preferred option. The sites are within existing communities currently served by public transport.

Issue 4 – What can LDP 2 do to address problems along the A81 transport corridor?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Implement Local Transport Strategy and Active Travel Strategy	2. Implement LTS and ATS but remove Allander rail halt safeguarding from plan



Agree with preferred option – 81
 Agree with alternative option – 5
 Other / Don't Know – 8

Summary of comments from individuals:

The vast majority of responses agreed with the preferred option and in particular the “strong sustainability focus”. However, there was considerable concern relating to the air quality at Bearsden Cross, which was seen by many people to be very poor. Improving air quality (and avoiding any deterioration) here was therefore seen as a key priority. Other comments on the different aspects of the A81 corridor are set out as follows:

Active travel

A substantial number of comments referred to the existing Bears Way segregated cycle way, and in particular its future status. A number of responses suggested that it should be removed and replaced by a bus & cycle lane. Others stated that it should not be extended, while a number of responses suggested it should be extended further into Glasgow, to provide a safer cycling environment and encourage more people to use it. It was also considered by some that the junctions are unsafe in places, resulting in some cyclists choosing to use the main road carriageway. A small number of responses pointed out that cycling is not an option for some people.

Bus

Some comments suggested that improving bus services in the area will remove cars from the A81. Comments requested more frequent bus services were required and that there was no bus provision in the Mosshead area. A number of comments requested a loop bus to operate in the Bearsden and Milngavie area.

Rail

Many comments were received requesting an additional station is delivered at Allander, with associated parking while other comments said this additional station was not required as Hillfoot station is within healthy walking distance. It was also requested that the rail line is dual-tracked to assist with the poor performance of the line.

Parking

It was requested that more parking is required at rail stations. It was also requested that there should be a period of free parking in Council car parks and that better parking in town centres is required overall. It was suggested that the reduction of disabled parking bays on Drymen Road is an issue for accessing shops as crossing the road is not safe.

Roads

Many comments stated that recent development in the area has increased road congestion and that road infrastructure is at capacity and that Canniesburn Toll in particular will become a bottleneck. It was suggested that traffic light programming requires to be updated at peak times of the day and traffic lights should be installed at crossings. It was also requested that there is better co-ordination of various service the reduce impacts on traffic from various roadworks through the year.

Summary of comments from groups and organisations:

Transport Scotland: The body of their response reiterated previous comments made on rail infrastructure and the safeguarding of land for a station at Allander. In terms of Allander, TS stated they did not support further feasibility/delivery work on the station at this time. In a previous response TS stated they did not support safeguarding land for stations if there wasn't a commitment for this further feasibility work. TS also reiterated examples of ongoing work which is being carried out by ScotRail and Network Rail to improve performance on the Milngavie line and noted that performance has been improving since the December 2018 timetable change.

SPT: Agree with the preferred option. Implementation of the LTS and ATS actions through LDP2 strengthens the status of these strategies and reflects the intrinsic relationship between transport/access and land use.

The safeguarding of the land for a potential station at Allander is supported as it does not commit to the delivery of the station but it does not preclude the delivery of a station at this location should this be identified in the future.

Network Rail: Agree with the preferred option. Network Rail are engaged with East Dunbartonshire Council and the consultants on their A81 corridor study and support the Preferred option for Issue 4 which seeks to implement the actions and projects identified in the Council's Local Transport Strategy. However, the proposed location for a potential station at Allander is only approximately 1.3km from the existing Hillfoot Station and 1.4 km from Milngavie Station. It has been advised previously by Network Rail that this may raise issues in terms of achieving appropriate line speed between stations and impacts on existing and future timetabling, and a STAG study which includes investigation of these issues is welcome.

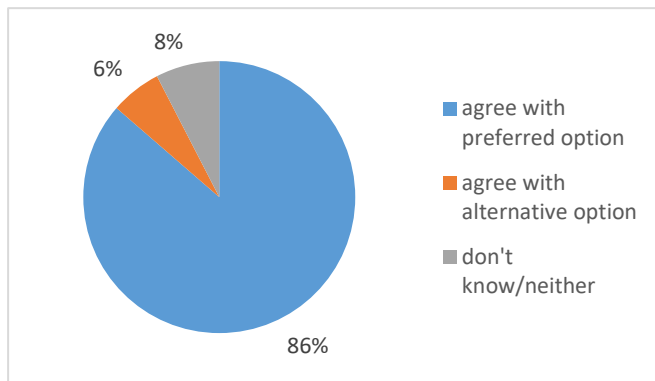
BRA: Bearden and Milngavie desperately needs co-ordinated public transport, including provision of Allander rail halt to ease road congestion (with park & ride facility). Also support EDC in its efforts to improve performance of Milngavie railway line.

MERA: MERA supports implementation of the Local Transport Strategy and Active Travel Strategy actions through the Local Development Plan. MERA strongly objects to the proposal of removal of the Allander rail halt safeguarding. Key projects include:

- Enhancement of the path and cycle network in Milngavie: encourage additional off road cycle routes. Suggest new route connecting Douglas Academy to Allander Sports Centre via Mains Estate Park and Craighdu Wedge.
- A quality bus corridor on the A81: to improve air quality, reduce congestion. Bearsway could be relocated.
- Investigating increasing parking capacity at rail stations on the A81 corridor: Support decking where practicable and achievable in keeping with setting.
- Undertake a STAG study to assess options for improving performance of the Milngavie railway line: Support the double tracking of Milngavie line.
- Safeguard land for a potential rail station and associated parking at Allander: Strongly support safeguarding of land for new station.
- Deliver junction improvements on the A81: Requires consultation with local residents and users
- Improve Canniesburn Toll for all road users: Works well at present so any changes should be undertaken with great caution. No action should be an option if there is no improvement in air quality.

Issue 5 – How can LDP 2 support and promote the local visitor economy in Bearsden?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Provide criteria to encourage appropriate new visitor economy or tourism development, with specific focus on 'Tourism Asset Areas'.	2. Provide criteria to encourage appropriate new visitor economy or tourism development without specifying locations (Tourism Asset Area approach).



Agree with preferred option – 57
 Agree with alternative option – 4
 Other / Don't Know – 5

Summary of comments from individuals:

Response were largely supportive of the preferred option. A range of suggestions were made, set out as follows:

- We could make much more of the Roman connection
- Preservation of green spaces will attract more visitors
- More (free) parking would make it easier to attract visitors
- Will be a struggle to attract people from Glasgow, where there are more things to do
- Antonine Wall needs protection from development

- Road network and infrastructure needs to be sorted out first
- Preferred option seems very short sighted. There is so much potential for the area. Bearsden Town Centre is hardly a tourist hot spot. There is a need for short stay accommodation in the area. Is there opportunity to team up with Visit Scotland to develop a Tourism Strategy for EDC as a whole rather than have separate piecemeal objectives for the main areas?

Summary of comments from groups and organisations:

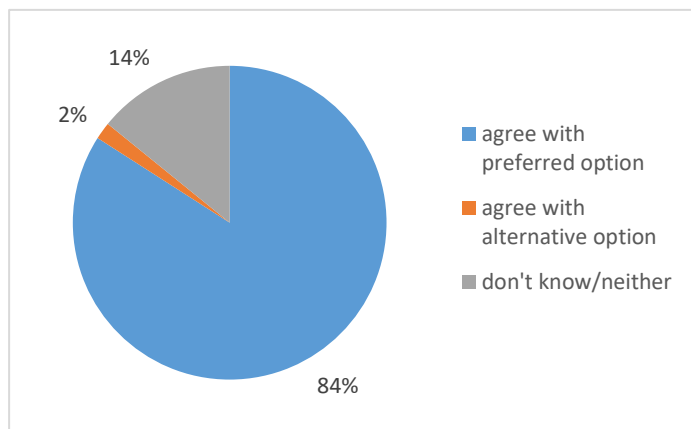
Historic Scotland - We are content with the preferred option which suggests providing criteria to encourage appropriate new development with focus on Tourism Asset Areas (TAA). We note that for Bearsden the Antonine Wall is being considered as a TAA and as such consultation with HES regarding the proposed criteria will be required. We would also note that any such criteria will need to accord with the Antonine Wall Management Plan and the Supplementary Planning Guidance for the Antonine Wall as well as ensuring no significant adverse impacts on the site or setting of these assets.

SPT – Agree with the preferred option. This encourages best use of the areas assets while seeking to manage and direct demand.

SNH - We support the principle of this approach. It will be important to ensure that criteria to promote the tourism/visitor economy, with specific focus on ‘Tourism Asset Areas’ provides for their understanding, protection and enhancement.

Issue 6 – Where should new cemetery provision in Bearsden be located?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Allocate a new cemetery site south of existing cemetery north of Baljaffray Road.	No reasonable alternative



Agree with preferred option – 95
 Agree with alternative option – 2
 Other / Don't Know – 16

Summary of comments from individuals:

The preferred option was overwhelmingly supported. It was suggested that any future development should include a new crematorium, as this is becoming more common. One comment requested that the cemetery

site should be set back from the main road. Another expressed concern that there is no assessment of the environmental impact, and that there should be more environmentally friendly burials.

One comment suggested that further cemetery space could be provided adjacent to New Kilpatrick Church (where there is an existing cemetery), rather than selling this land to a developer.

Summary of comments from groups and organisations:

BNCC - We do not support the proposed site which would be within the Antonine Wall World Heritage Site Buffer Zone, and could impact this area significantly. We suggest extending the cemetery to the North and/or North West as an alternative.

SEPA - As previously stressed by SEPA, locations for new or extensions to cemeteries should comply with our guidance on [“Assessing the Impacts of Cemeteries on Groundwater”](#)

It is sometimes the case that non-compliant sites can be made compliant through works but investigative measures need to be carried out in order to determine the feasibility of a site. We would strongly advise that such investigations be carried out prior to progressing adoption of sites. We note that the Report states that the Council’s Neighbourhood Services Team has identified the site south of the existing cemetery, north of Balijaffray Road, as being suitable for cemetery provision (Site S354). We were consulted in 2016 on a planned extension to Langfaulds Cemetery, on the outskirts of Bearsden, but this appears to relate to the field to the north of S354 and hence we are not aware of the appropriate investigations having taken place.

SNH - We recommend that regard should be given to the WHS buffer Zone.

Planning Authority response

The Proposed Plan has been prepared taking into account the responses received on the following issues.

Issue 2 – What is the most appropriate way of integrating the Bearsden Town Centre Strategy in LDP 2?

The vast majority of responses supported the preferred approach, and that the strategy should form an integral part of the overall plans for the area. It was clear that this was considered the best way to elevate the status of the strategy, protect the town centre and support future enhancements as set out in the strategy.

Conclusion: Implement preferred option

Issue 3 – Where should new housing in Bearsden be located?

A very large number of comments from local residents were received expressing strong support for the preferred option. There was also support from SEPA and SPT, particularly in terms of focusing on brownfield development as a priority. The Council also received responses from various site promoters, all of whom disagreed with the preferred and alternative options. These submissions focused on reasons as to why their particular site should be allocated for development in LDP 2. Please note that any new information that was provided for each site has been incorporated in to the updated site assessments (separate document). Overall, the Council does not agree that there is sufficient rationale to deviate from the preferred option.

Conclusion: Implement preferred option

Issue 4 – What can LDP 2 do to address problems along the A81 transport corridor?

The vast majority of responses supported the preferred approach, and that issues relating to the A81 should be addressed through both the Local Transport Strategy and Active Travel Strategy, and that this strategy should form part of LDP 2. A period of consultation was held in September – November 2019 on the Draft Local Transport Strategy 2020-2025. This period of consultation overlapped with the Main Issues Report consultation. The vast majority of comments received through the MIR consultation were therefore also received and considered through the process of finalising the [Local Transport Strategy 2020-2025](#).

Conclusion: Implement preferred option

Issue 5 – How can LDP 2 support and promote the local visitor economy in Bearsden?

The preferred option was largely supported. The Council will consider relevant suggestions as part of the drafting of this policy, including alignment with the Antonine Wall Management Plan.

Conclusion: Implement preferred option

Issue 6 – Where should new cemetery provision in Bearsden be located?

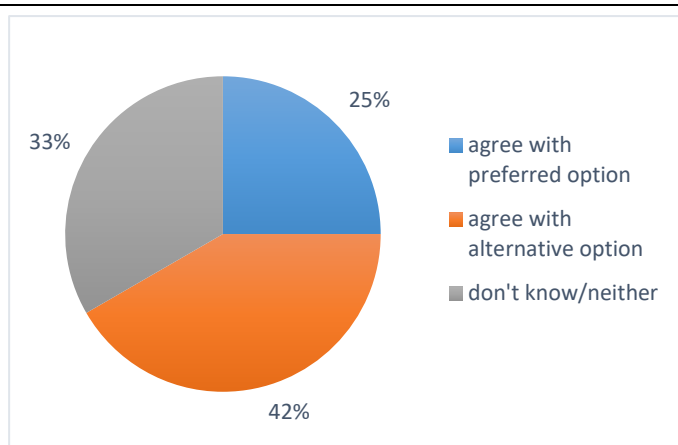
The majority of questionnaire responses supported the preferred option, however a number of concerns were raised about the potential impact on the Antonine Wall World Heritage Site buffer zone. These concerns will be investigated and addressed as part of the Proposed Plan process.

Conclusion: Undertake further investigation regarding potential impact on Antonine Wall buffer zone and any environmental implications

The Proposed Plan is subject to consultation, with all representations being considered by a Reporter on behalf of Scottish Ministers. This provides a final opportunity for comments.

Bishopbriggs

Community Area/Policy Theme	Bishopbriggs	
Elements of the engagement included:	<ul style="list-style-type: none"> • Questionnaire • Drop In Session • Hard copy paper responses • Emails 	
List of Organisation(s) commenting on this topic		
<ul style="list-style-type: none"> • Barratt Homes West Scotland and David Wilson Homes West Scotland • Bishopbriggs Community Council • Geddes, for Taylor Wimpey (West Scotland) & Caledonian Properties Ltd • Historic Scotland • Icen Projects Ltd, for Derwent London PLC/Caledonian Property Investments Ltd • Icen Projects, on behalf of Mactaggart & Mickel Homes Ltd • Jo Swinson (MP at time of consultation) • Montagu Evans, for Caledonian Properties Ltd • Montagu Evans, for Philip Smith Commercials Ltd • Network Rail • North Planning and Development, for Taylor Wimpey • NHS Greater Glasgow & Clyde (NHSGGC) • Persimmon Homes • Scottish Water • Scottish Environment Protection Agency (SEPA) • Scottish Natural Heritage (SNH) • Strathclyde Partnership for Transport (SPT) • Transport Scotland 		
Planning authority's summary of the representation(s):		
<p><u>Issue 7 - What is the most appropriate way to ensure any proposals for land use change or development in Auchinairn reflect the priorities identified in the Auchinairn Place Plan?</u></p>		
<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>	
1. Include the Place Plan priorities relevant to development and land use change in LDP2.	2. Cross refer to the Place Plan on a case by case basis at planning application stage	



Agree with preferred option – 3
 Agree with alternative option – 5
 Other / Don't Know – 4

Summary of comments from individuals:

- Alternative option would make identifying changes to the original plan easier
- Do not need any more housing as schools, road congestion, road conditions, air quality are being badly affected . The exception is specifically built housing for disabled people and their families, who are wheelchair bound and require hoists and wet rooms. This is badly needed everywhere in the Council area. Currently the nearest facilities I am aware of like that are in Clydebank. To live there disabled people would need to remove any children from school and would most likely lose their local support from friends and family

Summary of responses from groups and organisations:

Geddes, for Taylor Wimpey (West Scotland) & Caledonian Properties Ltd – Agree with alternative option. The Place Plan has yet to be published and does not form part of the adopted development plan. The Place Plan has therefore not been subject of formal Examination or formal consultation. It should not form an integral part of the decision-making process as proposed by the preferred option.

The Reasonable Alternative Option is considered to be more appropriate and reflective of the limited consultation undertaken. The Planning (Scotland) Act 2019 requires local authorities to ...take into account a registered local place plan. Consideration of the Place Plan on a case by case basis at planning application stage is more appropriate.

Persimmon Homes (Various Sites) - The incorporation of Place Plans in LDPs has the potential to make LDPs larger and more unwieldy as new Place Plans emerge over time and form new layers of LDP information. Additionally, local communities may not have the resources to review Place Plans every 5 years or alongside the LDP cycle whilst it will become confusing for the local community as to what they are engaging with. Place Plans should be material considerations referred to within and read alongside the LDP. It may be that some of the Place Plan priorities mirror that of the LDP. If the Place Plan was a material consideration it will allow professional officers to attribute appropriate weight to the Place Plan when an application is being determined.

Research compiled by Pinsent Mason, Appendix 1, highlights that Place Plans may not be truly representative of the local “communities” views. It demonstrates that whilst circa 90% of people voting on a Neighbourhood Plan in England support the plan only around 25-30% of the “community” turnout to vote.

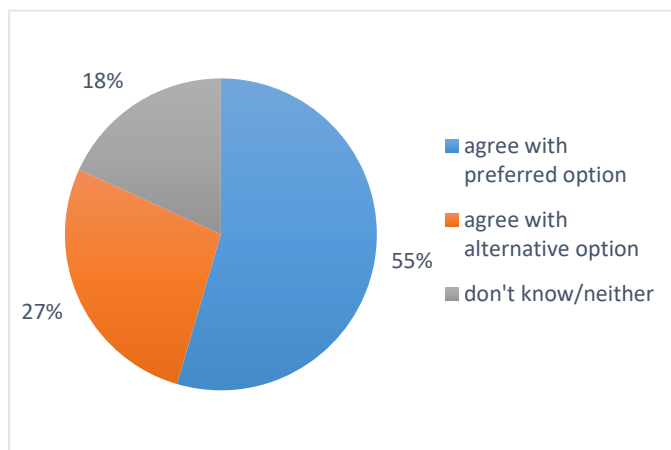
Better engagement in the actual LDP process will prevent the creation of Local Place Plans which are potentially not representative of the local view of how an area should be developed.

Scottish Water - Contact should be made with Scottish Water if there are to be any changes to the land use of the plan. This will ensure we can give the most up to date information we have available to both East Dunbartonshire council and any developers that may wish to build here.

SPT – Agree with the preferred option. To not include the plan priorities within LDP2 would lessen their status.

Issue 8 - What is the most appropriate way of integrating the Bishopbriggs Town Centre Strategy?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Incorporate all actions identified in the Bishopbriggs town centre strategy within LDP 2.	2. Retain town centre strategy as planning guidance and cross refer where appropriate



Agree with preferred option – 6
 Agree with alternative option – 3
 Other / Don't Know – 2

Summary of comments from individuals:

- Including the actions in Plan will make it easier to identify where any changes have been made.
- Prefer alternative option as this would make identifying changes to the original plan easier to spot
- Concerns that actions supporting additional housing in town centre would add to congestion and schools, road condition and air quality are being badly affected.
- Unsure how the implications of the options differ
- the large redevelopment of a supermarket on an already struggling retail centre (I'm not sure how the Retail Capacity Assessment concludes that the vacancy rate is low, when in point 5.8.3 it lists all the recent closures). Given the Town Centre Strategy is not included in the files to review, I remain concerned that the impacts of this redevelopment will not help the town centre of Bishopbriggs.

Summary of comments from groups and organisations:

Bishopbriggs Community Council – Agree with the present Policies contained within the Local Development Plan - the emphasis on design, enhancement, improved air quality, opportunity to enhance green infrastructure, community facilities and open space. All of the above would enhance our local Town Centre which is our principal concern at this point in the development of Bishopbriggs. It is vital therefore to have a Masterplan for the Entire Town Centre.

The Town Centre Development is a wonderful opportunity to enhance our green infrastructure, encouraging imaginative healthy outdoor recreation. Community events, farmers markets, gala days, children play area, skateboarding etc. are perhaps some of the activities which could be encouraged. We have an opportunity to have a town centre that would encourage people to visit, shop and be proud of.

One such suggestion is that the burn which was culverted beneath the site could be re-opened as a water feature, which, with appropriate planting of broad leaf trees would help to absorb some of the carbon in the atmosphere. The Civic Space proposed in the Masterplan should be planned to enable and encourage walking and cycling in the area, thus enabling walking/cycling through parkland/greenery from east to west through Bishopbriggs.

In the light of serious concerns about Climate Change, particularly the recent Government objective of being Carbon Neutral by 2050, the Petrol Filling Station recently proposed for the town centre should be changed to be being made up of purely Electric Charging Stations, helping to offset the detrimental effect on the air quality around Bishopbriggs Cross, already the poorest in East Dunbartonshire.

Bishopbriggs could have an attractive tourist potential – close to the big city, but with a village feel and also having easy access to the countryside.

Most important of all however, however is that it must have the Entire Town Centre Masterplan as its basis, with particular emphasis on the civic space.

Geddes, for Taylor Wimpey (West Scotland) & Caledonian Properties Ltd – Agree with the alternative option.

There are 18 actions identified in the Bishopbriggs Town Centre Strategy with varying indicative timescales for implementation – short term (up to 1 year), medium term (up to 4 years) and long term (over 4 years). The Bishopbriggs Town Centre Strategy (November 2018) is stated to align with a number of related plans and strategies. All identified plans and strategies were produced at different points in time, have conflicting status (statutory / non-statutory) and will be required to be updated at a point in the future. Accordingly, the Bishopbriggs Town Centre Strategy will also be required to be refreshed as a result of these evolving plans and strategies.

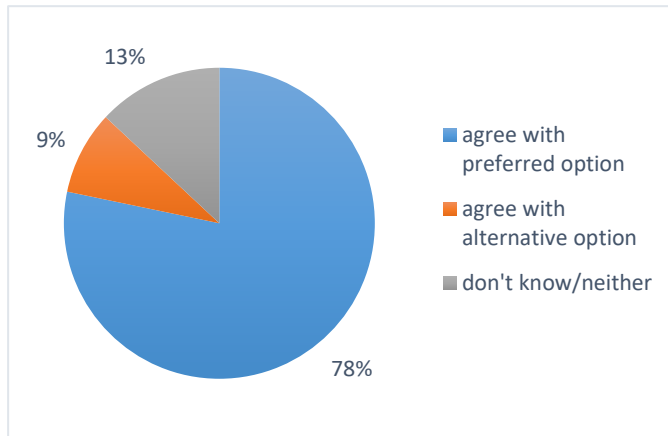
Given the changing nature of these plans and strategies, the actions identified in the Bishopbriggs Town Centre Strategy may also alter in terms of timescale, lead partner and relevance.

The Reasonable Alternative Option is therefore supported and the policy framework of the Proposed LDP 2 should retain the town centre strategy as planning guidance and cross refer where appropriate.

SPT – Agree with the preferred option. To not include the strategy actions within LDP2 would lessen their status

Issue 9 - Is the current policy relating to Strathkelvin Retail Park still appropriate?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Update wording in LDP 2 to reflect the evolving role of SRP as a retail and leisure destination with food & drink units.	2. Remove current policy wording relating to SRP, in which it states the Council will only consider comparison retail.



Agree with preferred option – 18
 Agree with alternative option – 2
 Other / Don't Know – 3

Summary of comments from individuals:

- We need to protect Bishopbriggs town centre and transform it back into a retail and leisure destination which is accessible by active travel and public transport, Bishopbriggs town centre has lost so many businesses, is an eyesore and referred by many as a 'ghost town'. If Strathkelvin Retail Park gains the right to Convenience Retailing then ED's town centres will all suffer the consequences.
- Disagree with preferred option. It doesn't really reflect the retail park.
- The retail park is not coping at weekends with traffic, need investment in this facility.
- We need more individual shops selling different goods
- Need more leisure and recreational activities in local expanding area
- The retail park should remain as is, varied options, clothing shops, carpets, diy, shops selling variety of goods, food stores, restaurants etc.
- Happy for the retail park to be extended and open a furniture store which is badly needed.
- Ok with the site being expanded to build a cinema and more shops or restaurants

Summary of comments from groups and organisations:

Geddes, for Taylor Wimpey (West Scotland) & Caledonian Properties Ltd – Agree with the preferred option.

Iceni Projects Ltd, for Derwent London PLC/Caledonian Property Investments Ltd (S304 – North East of Strathkelvin Retail Park) Agree with preferred option. Provide detailed comments on the site assessment for the site north east of the retail park being promoted by their clients, site S304, in relation to each of the points raised in the summary. Proposes to retain a green buffer on the southern and eastern extent of the site. Include an Ecological Constraints and NVC Survey.

Given the range of uses within Strathkelvin Retail Park it would be inappropriate to continue to refer to the location as solely for comparison retailing. The majority of the retail park benefits from an unrestricted open Class 1 retail permission, whereby food or non-food retail is acceptable. Furthermore, there are now a number of Class 3 food & drink operators in the park.

We note that Appendix 6 of the MIR Monitoring Statement is a Retail Capacity Assessment that includes reference to Strathkelvin Retail Park. Paragraph 5.11 in this document states, “*The retail park represents by far the highest concentration of comparison retail floorspace in East Dunbartonshire, at some 25,000 sq m gross...*”. Whilst this statement is partly true it does not include reference to the fact that a significant amount of this floorspace could be utilised for convenience, and/or food retailing purposes (12,000 sqm gross). The section of the retail park from the M&S Simply Food all the way round to Sports Direct presently benefits from an open Class 1 retail permission. We note that this document further recommends “no policy change” in the retail park – in conflict with Issue 9’s preferred option.

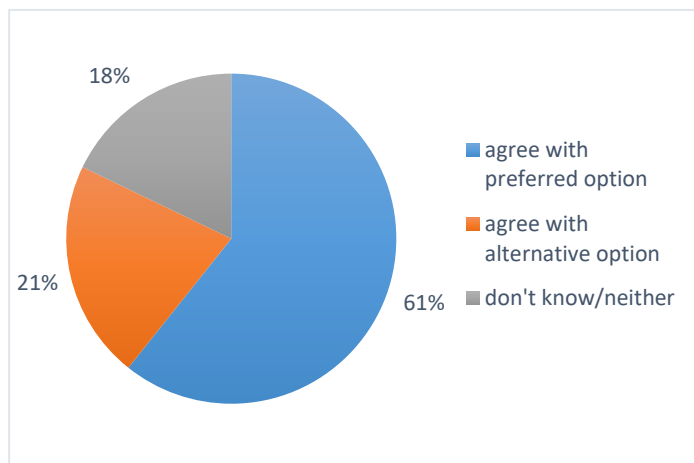
The above conclusions in appendix 6 of the Monitoring Statement appear to be at odds with the existing position in the retail park, in that a significant amount of the retail park benefits from unrestricted retail consent.

We do however agree with the proposal to refer to Strathkelvin as a destination for retail and leisure uses, with food & drink units in Issue 9. In the continued preparation of the LDP 2 we would be pleased to clarify further the existing position with the planning permissions that are in place within the retail park at present.

SPT – Agree with the preferred option. The policy should reflect the current uses within the retail park but should also protect the role of Bishopbriggs and Kirkintilloch town centres.

Issue 10 - How should the Westerhill area be regenerated?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Extend the Westerhill area for potential mixed use development	2. Promote the redevelopment of existing business and employment and / or brownfield land at Westerhill for mixed uses in line with the current LDP.



Agree with preferred option – 17

Agree with alternative option – 6

Other / Don't Know – 5

Summary of comments from individuals:

- Westerhill would be a good rail and bus park and ride
- Park and ride is not as important as promoting good public transport and active travel routes
- Support park and ride, this is more pressing than better public transport and active travel promotion
- The A803 should have a cycle lane connecting Bishopbriggs to Glasgow
- Several comments voiced disapproval of the inclusion of housing in the preferred option and concerns about the effects any new housing may have on local service provision, particularly schools and doctors' surgeries which are at capacity. The proposals are for 400 houses to be developed at Westerhill. No housing should be built until this is addressed.
- Concern about the traffic and air quality impact of development.
- Some general support for the development of this brown field, vacant site and protect the green belt and wildlife corridors, which are beneficial for wildlife and wellbeing.
- Some support for the business/employment, retail and cemetery provision aspects of the preferred option.
- Several respondents were concerned for the protection of the environment of Westerhill, its green space, wildlife corridors and Low Moss Nature Conservation Site in particular. The Westerhill proposals cover local areas of importance for biodiversity which suggests that development could take place within these. However this goes against the Council's biodiversity duty to protect local nature conservation interests.
- Disagree with the Preferred Option and would like the Reasonable Alternative Option to be chosen. I note from the Monitoring Statement that the Reasonable Alternative Option would "benefit all groups as it would provide a mix of business, residential and commercial uses" whilst not incurring the Risks which are outlined as pertaining to the Preferred Option.
- Westerhill redevelopment needs to be done very sensitively, must protect the Low Moss Local Nature Conservation Site. The new relief road and development could have an adverse impact on wildlife and their routes in and out of the site.
- Agree with alternative as a least worst impact on the Local Nature Conservation Site, and will limit over development.
- Agree with preferred option, except housing
- Agree with development of a furniture store, restaurants, cinema or other shops, retail park could be expanded
- Unsure if cemetery is needed, if extra land is definitely needed then it's needed and should go ahead providing it doesn't encroach on greenspace/ nature reserve.
- Concerned about traffic impact of crematorium is the added traffic on the A803.
- Comments on uses for master plan include: unsure if business is needed but agree with the other uses.
- Agree with business and employment development.

Developers contributions, section 75 agreements - It's about time the money accumulated was spent. In particular the education funds considering Bishopbriggs Academy , Bearsden Academy and St Ninian's are at bursting point - Options

- approach should be made to PPP with a view to converting non teaching rooms into class rooms (this can be done year by year appropriate to avoid placing requests) I.e. if a storage room is

converted due to one year being oversubscribed, it can be put back to storage following year if the school isn't oversubscribed

- hire portacabins on a year by year basis (size appropriate) this will also avoid placing requests
- should all the new housing recently built, being built and future developments cause a permanent issue - ppp should be approached to build an appropriate sized permanent extension (on a year if it's not required - it can be used for the community or extra study, rooms for s5 and s6 to use in between classes.
- re Bishopbriggs Academy, if some classes oversubscribed and turnbull is teaching the same subject but it's undersubscribed- an option would be to allow pupils from BB Academy to study at Turnbull- transport should be required via the existing school minibus or other (been done before and worked)
- is all the above doesn't happen use empty premises at the cross (old council offices) could be shared with turnbull. Transport should be provided (existing school minibus or other) - transport from the old high school to the new Academy took place before when it was being built and it was successfully. *there are other empty premises
- All of the above will save Council money in the long run, instead of transporting children from town to town. Besides all catchment children are and must be entitled to go to catchment schools in the town they live.
- From now on when dealing with housing planning applications - current capacity should not be used, future capacity including housing being built and future housing being discussed must be used instead.

The SEA environmental report has highlighted significant adverse effects on the environment as a result of the Westerhill proposals in Bishopbriggs and yet they still form part of the proposals and preferred housing package within the main issues report. If these are included within the local development plan there will be a presumption that mixed use development (including housing) will take place within this area. However I would suggest that until further assessments are carried out they should not be included as part of the Local Development Plan. These assessments should also not be restricted to contaminated land, compatibility of surrounding land uses and impact on biodiversity but also include assessments on how proposals in this area will impact the established Bishopbriggs community. Any further assessments will better inform what, if any, development can take place within the Westerhill area and help to manage expectations.

There is currently an East Dunbartonshire Council consultation being carried out on the admissions procedures for schools in Bishopbriggs, particularly concerned about the capacity of Bishopbriggs Academy. The current proposals include prioritising entry to Bishopbriggs Academy for those living within the catchment based on how close pupils live to the school. The Westerhill area lies adjacent to Bishopbriggs Academy and therefore any housing within this area would receive preferential entry to the school over other established areas within Bishopbriggs, particularly the Balmuildy catchment. Any further assessments of the impact the Westerhill proposals will have should therefore include a cumulative assessment of the impact of the proposals on existing infrastructure and services within Bishopbriggs, including schooling provision. There should be further dialogue between the planning and education departments to ensure that the Council's duty to provide schooling to residents within the catchment area can be met.

Summary of comments from groups and organisations:

Geddes, for Taylor Wimpey (West Scotland) & Caledonian Properties Ltd – Agree with the preferred option. The principle of the extension and regeneration of the Westerhill area is welcomed. This will generate local employment opportunities and deliver economic investment to the area. Newly created employment opportunities will require additional housing stock, with the demand for housing in Bishopbriggs likely to increase.

The proposed extension of Westerhill will also result in the eastern settlement boundary of Bishopbriggs extending beyond Westerhill Road, with Phase 5 of the Bishopbriggs Relief Road forming a new defensible settlement boundary.

The Council (please refer to Issue 11) should therefore seek additional locations for housing development which can be considered as effective sites.

Iceni Projects Ltd, for Derwent London PLC/Caledonian Property Investments Ltd (S304 – North East of Strathkelvin Retail Park) – Agree with preferred option.

As advised previously in this representation the extension to the retail park could be taken forward as a standalone proposal. However, given our client's wider land interests in the Westerhill area they are pleased to engage in the masterplan proposals as per the preferred option.

Specific reference is made in the preferred option to the retail park and the potential for "expansion to incorporate retail, leisure, food and drink where there is a specific locational need...". Again, our client is in agreement with this statement in the preferred option. Our client is also supportive of the proposed transport infrastructure proposed as part of this option, including the completion of the Bishopbriggs Relief Road, phase 5 and the creation of strategic links to Strathkelvin Retail Park from the wider vicinity.

Montagu Evans, for Caledonian Properties Ltd -

Generally support principles of Issue 10 and proposals to regenerate Westerhill. Welcome opportunity to work with Council and contribute to preparation of a masterplan for the area.

Object to limitations of boundary for preferred alternative options, to extend Westerhill area for a potential mixed use development. The Bishopbriggs Relief Road phase 5 should not provide the settlement boundary on the eastern edge of Bishopbriggs. There should be further opportunities to extend the settlement beyond the proposed road.

The proposed uses should not just be limited to business development but there are opportunities to provide further residential, park and ride and an enhanced landscape boundary.

Montagu Evans, for Philip Smith Commercials Ltd (S203 Westerhill Rail Sidings) - Refers to their landholding at the former railway sidings to the east of Westerhill Road. The eastern portion of the site should be included in the Westerhill Area at issue 11, with the specific opportunity for public transport improvements to be derived around a park and ride facility at the recently formed site access. In time, this could form the location of a future rail halt. Land to the east of Westerhill Road can play an important part in the realisation of the Council's development ambitions for the Westerhill area, and in particular in delivering the park and ride facility.

We note with interest that the Westerhill Rail Station is not included in the Draft LTS as either a preferred or alternative option, principally on the basis that it does not feature as a Scottish Government investment priority. It nevertheless remains a long-term aspiration of the Council that the safeguarding of land is retained within the emerging LDP 2. This station is therefore indicatively shown on the plan at page 37 of the MIR within our client's landholding at the former rail sidings.

Also note that the Draft Local Transport Strategy identifies the action to investigate the feasibility of a bus park and ride adjacent to Westerhill Road and rail line. We contend that this can appropriately be provided at our client's site, which benefits from good access onto the emerging Bishopbriggs Relief Road via a newly formed access.

Network Rail – Agree with the preferred option. We are pleased to note that funding models will be investigated through the Masterplan process to support and enable the delivery of development and that this includes the transport infrastructure. It is important that infrastructure objectives are capable of local delivery through the development plan process, including through use of planning obligations, and any policy which comes out of Issue 10 should incorporate use of planning obligations. We would recommend that “transport infrastructure” is quantified into “road and rail” infrastructure to ensure that contributions benefit the wider transport infrastructure and not just road-based.

In respect of the Masterplan safeguarding land for a potential rail station, we note from the plan of the Westerhill area (p37 of MIR) that this would appear to be within the vicinity of Cadder yard. We advise that Network Rail has plans to use this site for track renewals depot and a ‘mini’ High Speed Trains (HST) stabling/fuelling facility which may not be compatible with a new station. As part of this consultation response we are requesting that the site is identified and reserved for these railway uses.

NHS Greater Glasgow & Clyde (NHSGGC) - NHSGGC do not have a specific view on the proposals within issue 10, however, we welcome the acknowledgement of the potential need for additional health related facilities, if this issue is taken forward. NHSGGC continue to support the need to further and detailed engagement in relation to the potential impact both existing and new developments may have on the delivery of healthcare.

North Planning & Development, for Taylor Wimpey (S312 Birkhill) – Support preferred option.

As stated, Taylor Wimpey very much welcome the support for development over their land at Birkhill, as set out in the MIR, and welcome the opportunity to engage with the Council and other stakeholders to advance the existing work that has been done to develop a masterplan for the Westerhill area, and to include residential development over the southern part of the Birkhill site (Council ref. S312) and subsequent allocation of all as such in the Proposed LDP.

In summary the site offers an excellent opportunity to provide much needed housing on a site well located for access to amenities, employment and public transport:

- It is within an area already suited to residential development.
- The proposals are located within a mile of the existing town centre and train station.
- The development will include reinforcing the existing landscape structure of the site particularly along the existing boundaries.
- The development would have minimal landscape impact.
- The proposal would improve access to the High Moss Plantation LNCS.
- The development is supported by a Transport and Access Report
- The development is supported by a preliminary Ecological Assessment
- The Ecological Appraisal identifies a number of opportunities to improve and enhance the adjacent LNCS

It is therefore considered an appropriate and sustainable alternative to housing sites currently under consideration within the emerging local development plan.

Scottish Water - Scottish Water supports the masterplan approach and would ask to be invited to any future sessions to discuss in more detail any future proposals. This will enable Scottish Water to provide details of infrastructure requirements for sites when potential end users are known. If no information is available, we will provide the best information we have available at the time to help with decision making and will revisit this as more details become available.

SEPA - We support the proposal in the Preferred Option to develop a masterplan and would be pleased to work with you and other stakeholders in its development. We are pleased to note and support inclusion of protection and restoration of peatland within the elements of masterplanning, but would caution that focus should be on all peat and not just deep or “Category 1 peatland” as referred to – peatland represents a significant carbon sink as well as its biodiversity contribution. Restoration of degraded peatland so that it contributes to active sequestration of carbon is important, as well as measures to protect degraded peatland from further degradation and carbon losses.

SNH - We support the principle of a Master Plan approach to Westerhill as advocated by both the Preferred and Alternative options.

We also acknowledge that both options provide for the protection of the Low Moss and High Moss Nature Conservation Sites (LNCS) and that the Preferred Option also states that ‘The potential for the creation of a Local Nature Reserve covering these areas will be investigated’. Whilst, the creation of an LNR is something we would support, we consider that further development/extension of the area, including potential sites S304 (Commercial) and residential development sites S303, S312, S318, S362 and S363 wholly or in part, could potentially be add odds with this.

Our comments in relation to Site S304: All of this site is within the Low moss LNCS designation. We therefore consider that it would be very difficult to take this site forward without adverse impacts on the integrity of the Low Moss LNCS designation. This site is also currently designated as open space / green belt, adjacent to a relatively large commercial centre allocation (Strathkelvin Retail Park) to which it would provide an extension. The site is densely wooded and creates a buffer between the current commercial area and the adjacent vehicle testing site and prison to the east. Should the site be allocated, then this woodland should be fully assessed and mapped as there are likely to be trees of value to enable good place-making in addition to those with TPO status. The trees and the mature hedge on the boundary with Crosshill Road (B819) should both be retained and reinforced where necessary. A green network buffer should also be retained at the southern edge of the site where it would abut on the Low Moss LNCS site, whilst ensuring the opportunity for responsible access. These should be included as a basis for site requirements if this site is taken forward.

We have provided further/ specific comments on sites S303, S312, S318, S362 and S363 in relation to Issue 11 below and S356 in relation to Issue 13

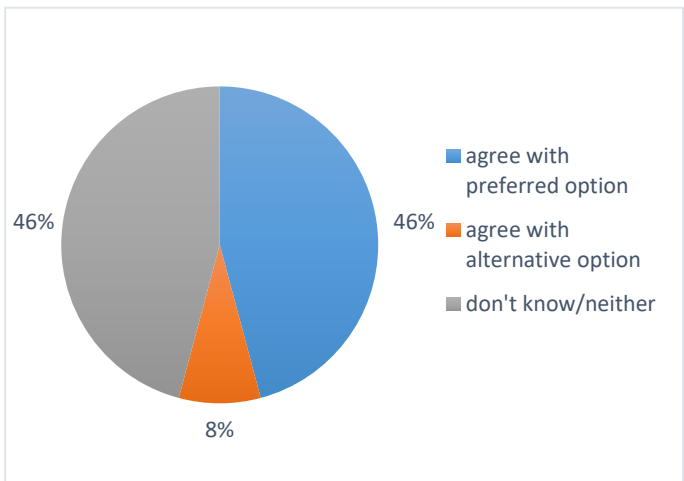
SPT – Agree with the preferred option. The preferred option provides the opportunity to link to wider plan. The mix of uses and location of housing should be cognisant of the availability of sustainable travel options.

Transport Scotland - The body of their response reiterated previous comments made on rail infrastructure and the safeguarding of land for a station at Westerhill. In terms of Westerhill, TS stated they did not support further feasibility/delivery work on the station at this time. In a previous response TS stated they did not support safeguarding land for stations if there wasn’t a commitment for this further feasibility work.

Issue 11 – Where should new housing in Bishopbriggs be located?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Allocate the sites from the preferred housing package (see Issue 34) located within Bishopbriggs, in addition to the sites within the current LDP and/or with planning consent:	2. Allocate the sites from the alternative housing package (see Issue 34), none of which are located in Bishopbriggs.

<ul style="list-style-type: none"> • S333 Former Auchinairn Primary School , Beech Road, (100% affordable housing) 40 homes • S330 Duncryne Place/ Brackenbrae Rd (100% affordable housing) 20 homes • S306 Former Bishopbriggs High School (Additional capacity to existing allocation LDP 6.17) 74 homes (total capacity including current LDP allocation of 46 is 120 homes) • S303, S312, S318, S362 & S363 Westerhill (including Birkhill Ave and Stanley Drive) – See also Issue 10 above. Site subject to further assessment to determine extent of area suitable for housing, possibility and extent of contamination, compatibility of surrounding uses and impact upon biodiversity. 	
--	--



Agree with preferred option – 11
 Agree with alternative option – 2
 Other / Don't Know – 11

Summary of comments from individuals:

- Object to new homes being built in Bishopbriggs. Secondary schools and health services are at capacity and primary schools need expanded so cannot accommodate new housing. Need cumulative assessment of and investment in these facilities before any new houses are built.
- New houses that are closer to the academy than existing houses within the academy catchment put children of existing homeowners/council tax payers at a potential disadvantage based on the proposed distance criterion in the new transfer arrangements consultation. This should not happen.

- Concerned at traffic impact of new housing on busy roads and the retail park is not coping at weekends with traffic.
- Totally against the release of any more green belt sites when there are brownfield sites available
- No more family housing anywhere in Bishopbriggs at all, affordable housing isn't affordable anyway. The exception is housing specially designed for disabled people with or without families. The nearest facilities like this were/are in Clydebank which is not good enough as if people move they lose their social support. The Council should ensure some of these types of houses are built in a central location (if available) in every town.
- Yes to deallocation of housing sites at Crofthead and Thomas Muir Avenue - it's a shame that option wasn't available for Jellyhill which was precious to everyone in Bishopbriggs for leisure and valuable to wildlife.
- The SEA environmental report has highlighted significant adverse effects on the environment as a result of these proposals and yet they still form part of the proposals and preferred housing package within the main issues report. Further assessments of impact on environmental issues and community should be carried out to inform what if any development can take place and until then they should not be included in the local development plan.
- The biodiversity duty is to protect local areas of importance for biodiversity.
- Developer contributions will not address the local issues of no space for secondary school to expand traffic management or a range of older people's housing.
- **S330 Duncryne Pl/ Brackenbrae Rd** - This site was not developed with the rest of the estate because of the ground conditions and contamination. People are not meant to enter the site.
- **S332 Huntershill** - This is a business area and is not appropriate for housing
- **S343 Crofthead Phase 2** - This site shouldn't be developed, it is a green lung for Bishopbriggs

Summary of comments from groups and organisations:

Barratt Homes West Scotland and David Wilson Homes West Scotland (S306 Former Bishopbriggs High) -

Reference is made to the above site which is subject to assessment for mixed use development in the East Dunbartonshire Main Issues Report (ref S306). Page 355 of the MIR monitoring statement sets an indicative capacity of 74 residential units for this site (50 private and 24 affordable). Barratt David Wilson Trading Ltd / Wm Morrison Supermarkets PLC submitted a detailed planning application to East Dunbartonshire Council on Friday 29th November 2019 for residential development and associated infrastructure (currently pending validation). The application proposes 147 units including four storey flatted blocks and townhouse development, (111 private and 36 social rented units). This proposed development is located on the eastern and north western parts of the allocation as illustrated on the attached masterplan. The planning application is accompanied by a full suite of supporting information including Transport Assessment, Ecology Report, Noise Assessment, Air Quality Report, Intrusive Site Investigation, Masterplan Framework/ Design & Access Statement, Flood Risk Assessment, PAC Report and Detailed Engineering Drawings.

Wm Morrison Supermarkets PLC submitted a separate application on the western side of the allocation under ref TP/ED/19/0186 for the 'redevelopment of existing superstore and car park to create replacement store, car park, petrol filling station, access, landscaping and associated works' on 15th March 2019. It is understood that this application is nearing determination and likely to be considered by planning committee in December 2019. The attached Masterplan also illustrates the Wm Morrison proposals visible outwith the red line boundary of the housing application. It should be noted that the 2 sites have been jointly designed and engineered to ensure continuity of linkages, connections, ground levels, drainage, open space and a logical framework for development.

Barratt David Wilson Trading Ltd / Wm Morrison Supermarkets PLC support the inclusion of the site for residential development in the emerging LDP. It is considered that the indicative site capacity of 75 as stated on page 355 of the monitoring statement should be revised to 147 units to reflect the above applications which are currently pending consideration by East Dunbartonshire Council and have each been subject to detailed pre-application discussions with Development Management officials. The current LDP allocates the entire site as 'Town Centre' with the far eastern extent zoned for housing development under '6.17'. It is also requested that the housing allocation boundary be revised to accord with the residential planning application red line boundary referenced above.

Geddes, for Taylor Wimpey (West Scotland) & Caledonian Properties Ltd (S5 Wester Lumloch) – Does not agree with either the preferred or alternative options.

Taylor Wimpey does not object to the principle of the Council's Preferred Option identified in the MIR but considers that there is a requirement to identify further sites for new housing to meet the Housing Land Requirement and provide a greater range and choice of new homes in Bishopbriggs. The development strategy for both the East Dunbartonshire local authority area requires modification to meet the growth estimates set out by the approved Clydeplan Strategic Development Plan (SDP) and Scottish Government.

Bishopbriggs lies within the Strathkelvin and Greater Glasgow North East Housing Sub-Market Area as part of the Bishopbriggs and Torrance Local Authority Sub-Area. The housing supply target and housing land requirement for the Strathkelvin and Greater Glasgow North East Housing Sub-Market Area requires to be addressed as part of the Proposed Local Development Plan (LDP) 2.

The latest 2016-based Principle Household Projections illustrate that household growth across East Dunbartonshire from 2016 to 2032 is projected to be an estimated 4,181 new homes. Taking account of the existing need of circa 900 homes this equates to housing need and demand / housing supply target of 5,081 homes. This matter is discussed in detail in response to Issue 34: Housing Land Requirement.

The Council has an opportunity to reconsider the proposed development at Wester Lumloch Road, Bishopbriggs (Ref: S5). A Development Framework Report, Site Effectiveness Statement and Site Assessment Review have been prepared and support this representation to the MIR. The evidence presented in the Development Framework Report supports the site's allocation in the Proposed LDP 2 for the following reasons:

- The proposal is in a sustainable location with access to public transport and local amenities within easy walking distance.
- The site is immediately effective and would be constructed over a ten year period during the LDP 2 plan period.
- The allocation of the site will be in keeping with the character of the surrounding urban and local landscape context.

The allocation of the site would establish a clear and identifiable Green Belt boundary on the ground without compromising Green Belt objectives.

Geddes' Site Effectiveness Statement confirms that the site is effective and can deliver housing completions within the first five year period of the LDP. Geddes' Site Assessment Review confirms that the Council's Site Selection Methodology for identifying preferred and alternative sites for housing in the MIR requires further clarification, including additional information within the individual site SEAs to justify scoring. It commented that the Council has not provided any ranking or comparison of sites as part of its site assessments. The Council's methodology needs to address the evidence required to fulfil the fundamental policy requirement from SPP, that sites allocated should be effective or capable of becoming effective during the plan period. It is recommended that all sites submitted in preparation of the Proposed LDP 2 should be reassessed in order to provide a generous housing land supply over the 10 year period to 2032.

Wester Lumloch Road, Bishopbriggs (Ref: S5), has not been identified by the Council as either a *Preferred Option Allocation* or as an alternative site. However, there is limited background evidence to support the Council's methodology and rationale for this approach. Geddes updated the Specialist Appraisal and SEA Assessments have been as part of Site Assessment Review in order to assist the Council in its reassessment to identification additional housing sites as part of the Proposed LDP 2. On the basis that the Council is required to provide a generous housing land supply over the period of the emerging LDP2, Geddes state that the Council should re-assess all sites submitted in preparation of its Proposed LDP2.

The Revised Specialist Appraisal (Appendix 1) highlights that there are no significant constraints to the development of the site. The site is effective and will be delivered within the period of the Proposed LDP 2.

The Updated SEA Assessment (Appendix 2) demonstrates that the site should be considered to have an overall minor positive/neutral score against the SEA criteria.

Iceni Projects, on behalf of Mactaggart & Mickel Homes Ltd (6.20 Crofthead Phase 1) – Our client does not agree with the preferred or alternative options proposed under Issue 11, which would result in the deallocation of the Site for housing.

- The Site is currently allocated for housing within the adopted Local Development Plan and therefore the acceptability of housing at the Site has been endorsed by the Council and there have been no changes since the Site was allocated that would justify the deallocation of the Site and the loss of the associated units from the Council's Effective Housing Land Supply;
- The Site is brownfield and is highly sustainable. It is located within the Bishopbriggs settlement boundary, within walking distance to local transportation modes, schools and local amenities including Strathkelvin Retail Park, ASDA and local employment destinations. This supports the prioritisation of brownfield land over greenfield land in line with the strategic planning objectives of local, regional and national planning policy; and
- The development of the Site for housing will result in net biodiversity and sustainability benefits in terms of the remediation of brownfield land; the provision of high quality private and affordable housing for the area; the redevelopment of a brownfield site close to existing transport links and services; provision of a new children's play area and open space; improved accessibility to the existing LNCS and provision of enhanced ecological features to connect with the existing green network. Beyond this, there will be a significant amount of economic benefit during the construction of the development as well as operational benefits when new residents move in.

The promoter also states that the issue of light has been addressed through the Light Pollution Study. In addition, all other technical aspects of development have been addressed at the Site and demonstrate that the Site should continue to be allocated for housing.

Iceni Projects, on behalf of Mactaggart & Mickel Homes Ltd (S343 Crofthead Phases 1&2) – Our client does not agree with the preferred or alternative options outlined under Issue 11 of the MIR. As outlined under our assessment of Issue 34 of the MIR, there is requirement for additional housing allocations within Bishopbriggs. The promotion site at Crofthead Phases 1 & 2 is brownfield and is located within the Bishopbriggs settlement boundary, close to public transport, pedestrian and cycle routes as well as amenities, services and employment destinations. Therefore, it is highly sustainable and meets the objectives of the preferred approach in terms of the prioritising the regeneration of vacant, brownfield land to limit urban sprawl whilst protecting the Green Belt. Similarly, in line with the preferred approach outlined in the MIR, the strategy for the site is to provide smaller homes to accommodate down sizers, retirement living and more affordable family housing for sale to meet demand and tackle the ageing population issues and declining school rolls in the area (see response to Issue 35). This Supporting Planning Statement and supporting documents demonstrate why the promotion site is suitable for housing, including further information on site assessments and strategic environmental assessment. A separate representation has

been submitted to Issue 11 of the MIR, to counter the proposal to deallocate the Phase 1 element of the promotion site. Please refer to this representation for full details in relation to this aspect of Issue 11.

Jo Swinson (MP at time of consultation) - We are facing a significant housing shortage and I fully appreciate the need to build new homes. However, there are a couple of points which I hope you will bear in mind when considering future planning applications on the proposed sites.

Firstly, the Council's recent consultation on changes to school admission procedures, and primary to secondary school transfer arrangements, brought to the forefront an issue that parents are becoming increasingly worried about.

This year, Bishopbriggs Academy could not accept any placing requests as the school had reached capacity. In 2022, the projected S1 intake from the catchment area is 220, 10 over the S1 cap. While I note that the Council is not concerned about this issue, additional housing developments could have an impact on school numbers – as you are aware, projections are not always accurate. The School Admissions Policy should be considered in tandem with the Local Development Plan 2, as future residential development is somewhat key to the concerns that current residents in Bishopbriggs (and also in Bearsden) have about the proposed changes to the Admissions Policy.

Montagu Evans, for Caledonian Properties Ltd (S340 S341 North Bishopbriggs) – The masterplan area, submitted at call for sites stage, comprises three development sites (*site assessment sites S340, S341, S342*), as shown on the enclosed Masterplan. Please note that site A (*site S343*) is being promoted separately by Mactaggart and Mickel. Caledonian Properties seek allocation of the identified sites for residential development, and consider that the proposals would reflect a natural extension and infill of Bishopbriggs. Caledonian Properties have previously promoted the masterplan for residential development, however the sites were not supported. Since adoption of the extant Local Development Plan, the Council has progressed proposals for the new Bishopbriggs Relief Road, which will direct new development to the north of Bishopbriggs, supporting the subject masterplan area. We also note that proposals for at Site A on brownfield land are currently being progressed by Mactaggart and Mickel, who are preparing a detailed planning application for residential development on the site. A number of investigations and technical surveys have been commissioned as part of these works to mitigate impact on the Cadder Local Nature Conservation Site and Antonine Wall. Sites B, C and D are currently designated as Greenbelt within the extant East Dunbartonshire Local Development Plan. Site B (*site S340*) is well contained by industrial facilities and a remnant shelterbelt to the north. Site C (*site 341*) is contained by roads, Cadder Cemetery, and is screened along Cole Road by TPO Woodland. The Council has expressed an interest in site C for an extension to Cadder Cemetery. Site D (*Site S342*) is contained by Low Moss Prison to the south, the Cole Road TPO woodland to the west, with an on-site shelterbelt to the east with an open boundary to the north.

Also included detailed further information to be taken into consideration in the site assessments.

Montagu Evans, for Philip Smith Commercials Ltd (S203 Westerhill Rail Sidings) -

Refers to their landholding at the former railway sidings to the east of Westerhill Road. The eastern portion of the site should be included in the Westerhill Area at issue 11.

NHS Greater Glasgow & Clyde (NHSGGC) - NHSGGC do not have a specific view on the proposals within issue 11, however, we are aware of the need to review the potential need for additional health related facilities, if this issue is taken forward. NHSGGC continue to support the need to further and detailed engagement in relation to the potential impact both existing and new developments may have on the delivery of healthcare.

North Planning & Development, for Taylor Wimpey (S312 Birkhill) – Taylor Wimpey are supportive of the ‘Preferred Option’ 1. for Bishopbriggs which supports the allocation of land at Westerhill, including at Birkhill Avenue and Stanley Drive, for residential development, and most particularly we welcome the support afforded for residential development at Birkhill (Council site ref. S312).

It is recognised that the MIR stipulates a requirement for a masterplan to be developed for the wider Westerhill area, including the land at Birkhill (site S312), and that further assessment will be required to determine extent of area suitable for housing, possibility and extent of contamination, compatibility of surrounding uses and impact on biodiversity. Taylor Wimpey have already considered these issues relative to their interests at Birkhill, and as referenced this representation is informed and supported by the following documents which can be used as a basis to inform wider masterplan:

- Preliminary Ecological Appraisal (prepared by Brindley Associates),
- Flood Risk Assessment (prepared by Kaya Consulting)
- Transport and Access Appraisal Report (prepared by Transport Planning)
- Development Framework/Masterplan (prepared by EMA)

The Development Framework/Masterplan shows development on the southern part of the Birkhill site (Council ref. S312), due to the survey and advice set out in the Preliminary Ecological Appraisal. This report also identifies an area of Class 1 peat soils in the northern area where no development is proposed. The most sensitive interests are identified in the northern part of the Birkhill site, and not only does the Masterplan show these areas to be left free of development but the PEA also recommends further detailed habitat assessments to inform the required mitigation strategy and detailed layout proposals.

In addition offer detailed responses to the content of that the Site Assessments document, for site S312. The site at Birkhill is effective, sustainably located and is not affected by any insurmountable constraints to development, that the site can be allocated for residential development without adverse impact on the function or integrity of the Local Nature Conservation Site or the Open Space/Green Network Resource. The Birkhill site can and should be duly allocated for the development of approximately 200 houses in the Proposed LDP.

Scottish Water - Scottish Water is committed to working with East Dunbartonshire council and developers in the successful delivery of these sites. To ensure no detrimental impact to existing customers, it will be necessary for both a Water and Drainage Impact Assessment be carried out for the former Bishopbriggs High School site due to the number of proposed units. However, Scottish Water has initiated a Strategic Drainage Impact Assessment for this area with the S306 site having been placed into the study. As and when more information is known of any mitigation work that may be required, Scottish Water will share this information with the council and any known developers. Any such mitigation works that may be required should be funded by the developer and subject to Scottish Water’s Reasonable Cost Contributions.

SEPA - Again, we support the focus in the Preferred Option on brownfield and vacant land.

SNH - We agree in part with the Preferred Option. In terms of the following sites from the preferred housing package we have no specific/detailed comments.

- S333 - Former Auchinairn Primary School.
- S330 - Duncryne Place/ Brackenbrae Avenue.
- S306 - Former Bishopbriggs High School.

In terms of the following sites which are also included in the ‘preferred housing package’, but which we note are to be subject to ‘further assessment to determine extent of the area suitable for housing, possibility and

extent of contamination, compatibility of surrounding uses and impact on biodiversity', we comment as follows:

- S303 - South of Westerhill Road: The western part of the housing site overlaps with the High Moss LNCS. Any development here should respect the integrity of this designation.

Should development go forward, we would support the production of a Masterplan for the development of this site (in addition to sites S312 Birkhill Avenue and S318 Stanley Drive – see respective comments below)).

Enhancements to and retention of existing links to green networks should be included as site requirements, particularly through the existing woodland on the southern edge of the site. Housing should be focussed away from the LNCS to minimise impacts on the designated interest.

- S312 - Birkhill Avenue: The majority of this proposal is within the High Moss LNCS. We consider that it would be very difficult for this site to be taken forward without adverse impacts to the LNCS designation.

Whilst, there may be some potential for development here from a landscape perspective, a smaller number of houses would be more appropriate. In accordance with our comments in respect of S303, a Masterplan would be required for this site together with S303 South Westerhill Road and S318 Stanley Drive.

- S318 - Stanley Drive: The eastern half of the proposed development site is within the High Moss LNCS. Although some housing could be accommodated within the site area, beginning to surrender parts of this LNCS to development would set a concerning precedent (there are a number of proposals affecting it – including S303, S312 mentioned above). It is unlikely that development of the whole of this site could proceed without adverse impacts on the integrity of the LNCS. Moreover, we consider that development of these sites would be inconsistent with the terms of Issue 10 above, in respect of the potential for High Moss LNCS to form part of an LNR. Please see our comments in respect of Issue 10.

This small site is also well used open space and links to housing to the west and impacts on High Moss LNCS to the east. Should development of this site be taken forward, housing should be orientated to overlook paths providing for an active frontage. Also, if developed in isolation, a defensible boundary should be created to avoid further spread. Housing should be focussed on the western part of the site to minimise impacts on the LNCS.

If these sites are allocated (S303, S312 ,S318), we recommend appropriate developer requirements are identified by the Council and set out in the LDP. These might usefully include:

- Consider landscape capacity and necessary mitigation measures in further detail
- Retain and enhance existing mature trees/ trees & shrubs that contribute to landscape character and setting and help create a setting for the proposed development.
- Masterplan to ensure coherent design-led approach across the 3 sites, including coordinated palette of materials/ colours etc;
- Robust landscape framework with high quality functional open space and green network, active travel and recreation links.
- Ensure well designed active built frontage overlooking green space.
- Protect and enhance High Moss LNCS.

Development of sites S362 and S363, discussed below, should be avoided as they are likely to incrementally

erode the setting of Low Moss Plantation LNCS.

- S362: North of Westerhill Road: This site comprises rough grassland, potentially over peaty soils, and is adjacent to, but not presently within the Low Moss LNCS. This site is likely to be hydrologically connected with the adjacent LNCS - allocated to protect a remnant bog/peatland habitat. Building here could therefore potentially cause hydrological disruption to the adjacent bog LNCS leading to further habitat degradation of the LNCS. Moreover, development could compromise the potential for the adjacent LNCS to form part of an LNR as per our comments in relation to Issue10.

In addition, from a landscape perspective, development here would spread development to the southern edge of the LNCS. There is currently no defensible boundary and development here is therefore likely to result in further infill and spread. Should development of this site be progressed a defensible boundary and landscape framework should be required to avoid further spread.

- S363 - East of Westerhill Road: This site like S362 above, is rough grassland, potentially over peaty soils, adjacent to, but not presently within the Low Moss LNCS. Similarly, this site is likely to be hydrologically connected with the adjacent LNCS - which has been allocated to protect a remnant bog/peatland habitat. Building here could potentially cause hydrological disruption to the adjacent bog LNCS leading to further habitat degradation of the LNCS. Also, development here could also conflict with proposals to extend the LNCS into same area, as well as compromise the potential for the adjacent LNCS to form part of an LNR as per our comments in relation to Issue10.

In landscape terms, development here would spread development to the southern edge of the Low Moss Plantation. Like S362, there is currently no defensible boundary and development here is likely to result in further infill and spread. Should development of this site be progressed a defensible boundary and landscape framework would be required to avoid further spread.

Overall, we are concerned about the potential impacts of development of all of the above sites (those subject to 'further assessment'), both singularly and cumulatively. In particular we are concerned with the potential impacts on the integrity of the Low Moss and High Moss LNCS habitats the inconsistency with the proposed potential designation of the LNCS as an LNR, the loss of open space and the increased urban spread.

We believe that it will be extremely challenging to deliver development on these sites without compromising the above. We therefore recommend that these sites are not taken forward as part of the 'preferred package' of housing sites. See also our related comments to Issue 10.

SPT – Agree with the preferred option. The majority of the sites are currently served by public transport and are part of existing communities. Further work will be required in relation to the sites Westerhill which are remote from local services to reduce the potential for private vehicle travel.

Woodland Trust - Concerned with potential impact on native and ancient woodland from these site allocations. We list those of particular concern below, together with some recommendations.

S318: We do not recommend taking this further as it currently overlaps and area of native woodland identified on the Native Woodland Survey for Scotland (NWSS).

S312: This site allocation overlaps and area of native woodland identified on the NWSS and area of ancient woodland identified on the Ancient Woodland Inventory (AWI) towards the north. Do not take forward the part of the site that is on the woodland areas. Limit the site allocation to the part of the site without woodland, ensuring that an appropriate buffer is left between the woodland area and the development. This can be advised upon at planning application stage, however if this is likely to be a large development then we would advise at least 50m buffer between the development and the woodland area. This woodland may be used for the community should development go forward there, ensuring that access is managed for the protection of the woodland and enjoyment of visitors.

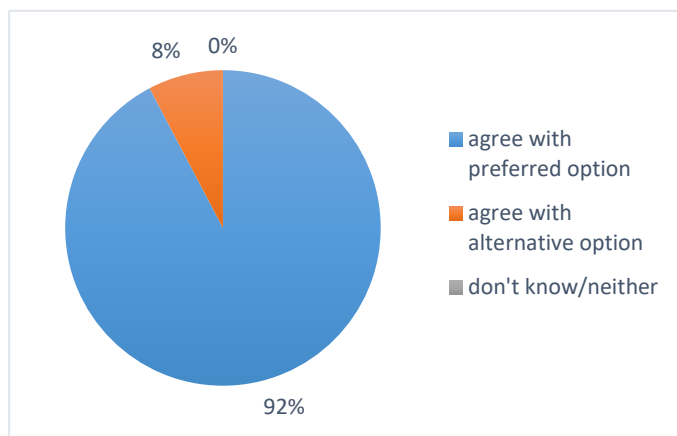
S303: It is unclear from the map if the western side of this overlaps the areas of ancient woodland and of native woodland which affects site allocation S312. If development does go ahead, same as recommended for S312 above regarding the buffer area and woodland access.

S362: This seems allocated on an area of native woodland identified on the NWSS, but unclear at the moment. If this is the case do not take forward.

S363: There is an area of native woodland identified on the NWSS in proximity of this site allocation. We recommend leaving a buffer between woodland area and development area.

Issue 12 - How can LDP 2 support and promote the local visitor economy in Bishopbriggs?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Provide criteria to encourage appropriate new visitor economy or tourism development, with specific focus on 'Tourism Asset Areas'.	2. Provide criteria to encourage appropriate new visitor economy or tourism development without specifying locations (Tourism Asset Area approach).



Agree with preferred option – 12
 Agree with alternative option – 1
 Other / Don't Know – 0

Summary of comments from individuals:

- Some comments that opportunities for visitor attractions on the canalside have been ignored/lost in the past (Jellyhill mentioned)
- The town centre is in need of rejuvenation and there is scepticism that it would attract visitors in its current state.
- We have nothing else in the area to attract tourists
- Town centre needs rejuvenated but in an aesthetically pleasing and considerate manner i.e. not a totally modern look! Bishopbriggs would thrive with a west end feel including: independent retailers that would survive and attract visitors, little delicatessens or interesting cafes instead of chain stores. All you can do in Bishopbriggs is go out to eat, and not worthy of repeated returns.
- Jellyhill land next to the Forth and Clyde Canal, Bishopbriggs, was an opportunity to be developed for local leisure use and tourism eg canoe huts, craft units, craft shops, restaurant; but houses were built there, for which there are no secondary school places. The council sold land there,

disregarded the existing residents of Bishopbriggs and failed to protect the setting of the Forth and Clyde canal and the Antonine Wall.

- Bishopbriggs Town Centre can't be a tourist attraction, it is dying

Summary of comments from groups and organisations:

Geddes, for Taylor Wimpey (West Scotland) & Caledonian Properties Ltd – agree with preferred option.

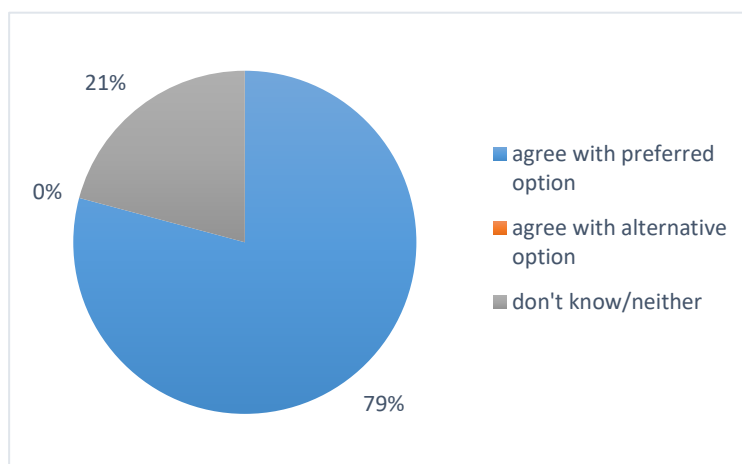
Historic Scotland - We are content with the preferred option which suggests providing criteria to encourage appropriate new development with focus on Tourism Asset Areas (TAA). We note that for Bishopbriggs the Antonine Wall is being considered as a TAA and as such consultation with HES regarding the proposed criteria will be required. We would also note that any such criteria will need to accord with the Antonine Wall Management Plan and the Supplementary Planning Guidance for the Antonine Wall. The Forth & Clyde Canal is also being considered as a TAA and again HES should be consulted regarding the criteria being proposed. The criteria should ensure that no significant adverse impacts to the site or setting of these assets are proposed by developments.

SNH - We support the principle of this approach. It will be important to ensure that criteria to promote the tourism/visitor economy, with specific focus on 'Tourism Asset Areas' provides for their understanding, protection and enhancement.

SPT – Agree with the preferred option. This encourages best use of the areas assets while seeking to manage and direct demand.

Issue 13 - Where should new cemetery provision in Bishopbriggs be located?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Allocate land to the east of Cole Road and south of Kirkintilloch Road (S356), excluding the Loretto Playing Fields	No reasonable alternative



Agree with preferred option – 19
 Agree with alternative option – 0
 Other / Don't Know – 5

Summary of comments from individuals:

- S356 is too large and close to road
- S356 Would get in way of future route and junction for BRR
- If it is needed then near the main road is the best location.

Summary of comments from groups and organisations:

Geddes, for Taylor Wimpey (West Scotland) & Caledonian Properties Ltd – agree with preferred option.

Historic Scotland - We are content with the preferred option of allocating land at S356 subject to the following advice. We have previously provided comments regarding the larger proposed allocation of S342 and S356, however we have the following more detailed comments to offer on the individual cemetery proposals at S356.

This proposed development site is immediately to the south of the Antonine Wall SM7553, 375m south of Hungryside to 55m north-north-east of Leafield, from which it is separated by the A803 Kirkintilloch Road. It is wholly within the Antonine Wall WHS Buffer Zone and is proposed to create a cemetery extension for Cadder Cemetery. The present land use is agricultural.

The potential adverse impacts of the creation of the cemetery extension on the setting of the World Heritage Site could be mitigated by careful design and the application of development management policies for archaeological sites. In particular, it should be noted that a cemetery extension in this area would probably require prior archaeological investigation, including excavation, given the proximity of the Antonine Wall and Cadder Roman Fort. The development would be subject to the terms of the *Supplementary Planning Guidance*, namely: 'Antonine Wall' Policy 2

There will be a presumption against development within the Frontiers of the Roman Empire (Antonine Wall) World Heritage Site buffer zones which would have an adverse impact on the Site and its setting, unless:

- mitigating action to the satisfaction of the Council in consultation with Historic Scotland can be taken to redress the adverse impact; and
- there is no conflict with other Local Plan policies.

Further consultation with Historic Environment Scotland is therefore recommended for any development in this area. There may be potential for the extension of the cemetery at this site. Although the site is immediately adjacent to the Antonine Wall and within the Buffer Zone, we consider that direct impacts can be mitigated by prior archaeological investigation and setting impacts may be mitigated by design.

SEPA - With regards to the proposed cemetery extension, S356, we make the same comments as under Issue 6. Locations for new or extensions to cemeteries should comply with our guidance on ["Assessing the Impacts of Cemeteries on Groundwater"](#).

It is sometimes the case that non-compliant sites can be made compliant through works but investigative measures need to be carried out in order to determine the feasibility of a site. We would strongly advise that such investigations be carried out prior to progressing adoption of sites.

SNH - We make the following comments in relation to the preferred site:

- S356 - Located to the east of Cole Road within the designated green belt, well beyond the settlement boundary. An open agricultural area that helps to prevent coalescence with Kirkintilloch. The geological LNCS could be affected by this proposal.

Clarity should be provided as to how this geological LNCS and other similar sites will be protected by the LDP.

Planning Authority Response

The Proposed Plan has been prepared taking into account the responses received on the following issues.

Issue 7 – What is the most appropriate way to ensure any proposals for land use change or development in Auchinairn reflect the priorities identified in the Auchinairn Place Plan?

The Auchinairn Place Plan covers the period 2019 to 2024 and was approved at Council on 27 June 2019 and reported to the Community Planning Partnership Board on 10 October 2019 after public consultation. The Place Plan is a Locality Plan, produced under the Community Empowerment (Scotland) Act 2015. Scottish Planning Policy section on outcomes identifies that: “At the strategic and local level, planning can make a very important contribution to the delivery of Single Outcome Agreements, through their shared focus on ‘place’. Effective integration between land use planning and community planning is crucial and development plans should reflect close working with Community Planning Partnerships. “ Only Place Plan priorities which relate to land use change will be identified in the Plan. Relevant priorities in future Place Plans will be considered during the next review of the Local Development Plan.

Conclusion: Implement preferred option

Issue 8 – What is the most appropriate way of integrating the Bishopbriggs Town Centre Strategy in LDP2?

Some responses supported the preferred approach, that the strategy should form an integral part of the overall plans for the area. In particular support was expressed for the action of a masterplan approach to the whole town centre, to ensure development makes improvements to public realm, walking and cycling green infrastructure. Whilst support was expressed for the alternative option it is not agreed that any responses received provide a rationale for pursuing the alternative option. The alternative was supported as it would accommodate likely future updates to the actions in the Strategy and their relevance and timescales. However the Strategy is intended to have a long term vision and supporting objectives. Future reviews of the Local Development Plan will take any relevant updates to the Strategy into consideration. There were also concerns about the impact of future supermarket, petrol station and housing development in the town centre however these will be addressed in detail at planning application stage.

Conclusion: Implement preferred option

Issue 9 - Is the current policy relating to Strathkelvin Retail Park still appropriate?

In the main the responses supported the preferred approach, comments included the local area needs more shops, leisure and recreation activities and that more areas of comparison retail could be used for convenience retail. Whilst support was expressed for the alternative option, the Council do not agree that any responses received provide a rationale for pursuing the alternative option.

Conclusion: Implement preferred option

Issue 10 – How should the Westerhill area be regenerated?

In the main the responses supported the preferred approach. This includes a masterplan approach for a mix of uses. Some concerns were raised about the capacity of schools and doctors’ surgeries to cater for new housing proposals, the demand for the different types of land use, the definition of the masterplan area, the need to protect local nature conservation sites and peatland and the need for assessment work to be carried out before sites are allocated. However these matters would be addressed in the masterplan: including the land use mix, location of development, design of proposals and mitigation of any effects. This

would be informed by further site specific assessments and more detailed development proposals for the area. Other comments did not support safeguarding land for a potential railway station but would like it safeguarded for rail depot, stabling and fueling instead. Whilst some support was expressed for the alternative option, it is not agreed that any responses received provide a rationale for pursuing the alternative option, as the issues raised will be addressed by further assessment of the site and the masterplan.

Conclusion: Implement preferred option, with wording updates to further strengthen policy.

Issue 11 – Where should new housing in Bishopbriggs be located?

There was no clear consensus on the preferred option. Comments made included: concern that secondary schools, primary schools and doctors' surgeries are at capacity and need new investment before new housing can be built. There was support from SEPA and SPT for the preferred option, particularly in terms of focusing on brownfield development as a priority. SNH is concerned about the biodiversity impact of sites at Westerhill and supports a masterplan approach. However these matters would be addressed in the masterplan: including the land use mix, location of development, design of proposals and mitigation of any effects. This would be informed by further site specific assessments and more detailed development proposals for the area. Support was submitted by landowners and agents with sites in the preferred option, some of whom provided further site specific information. The agent for the site 6.20 at Crofthead disagreed with the sites deallocation as they consider lighting issues can be addressed. Since the MIR was published, an appeal decision against refusal of planning permission for this site was reached (in Feb 2020), with the Reporter dismissing the appeal on the basis that all key requirements had not been met. Whilst support was expressed for the alternative option, the Council does not agree that any responses received provide a rationale for pursuing the alternative option. Responses were also received from agents for other sites, some of whom disagreed with the preferred and alternative options or wanted their site added to the preferred option. These submissions focused on reasons as to why a particular site was effective, would contribute to the land supply and should be allocated for development in LDP 2. Please note that any new information that was provided for each site has been incorporated in to the updated site assessments (separate document). However other housing sites suggested by landowners and developers are identified as unsuitable for development, and allocation, in site assessments. Another is unsuitable as it is in a Local Nature Conservation Site.

Conclusion: Implement preferred option, finalise work with education and HSCP regarding developer contributions.

Issue 12 - How can LDP2 support and promote the local visitor economy in Bishopbriggs?

In the main the responses supported the preferred approach. This included support for focusing and directing demand for tourist development to asset areas, and comments were made that opportunities for leisure and visitor facilities along the canal have been lost in the past. Other comments are that as well as promoting the tourist asset areas the policy criteria should highlight the need for their protection and enhancement. This will be addressed by the amendments to the Proposed Plan's policies for tourism which will complement the policies for the natural, water and historic environment and the Antonine Wall Supplementary Guidance. Relevant suggestions will be considered as part of the drafting of this policy, including alignment with the Antonine Wall Management Plan.

There were comments that Bishopbriggs town centre is declining and would not attract visitors. However the objectives of the Town Centre Strategy include encouraging a distinctive and vibrant town centre which is accessible and connected, and development which encourages visitors and tourists would contribute to this.

Conclusion: Implement preferred option

Issue 13 – Where should new cemetery provision in Bishopbriggs be located?

In the main the responses supported the preferred approach. However comments were made that the potential impact on the Antonine Wall World Heritage Site and its buffer zone would need addressed by archaeological investigation and mitigated by design, impact on groundwater should be investigated and the geological Local Nature Conservation Site and route of the future relief road protected. These issues will be addressed in the Proposed Plan, in particular the community policy for Bishopbriggs.

Conclusion: Implement preferred option

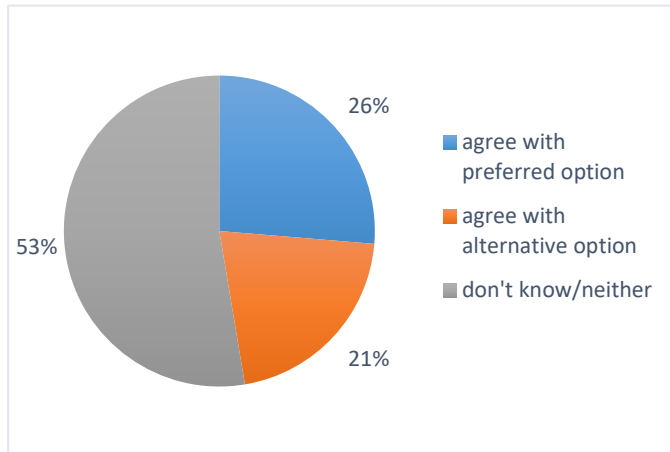
The Proposed Plan is subject to consultation with all representations being considered by a Reporter on behalf of Scottish Ministers, this provides a final opportunity for comments.

Kirkintilloch, Lenzie and Waterside

Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside	
Elements of the engagement included:	<ul style="list-style-type: none"> • Questionnaire • Drop In Session • Email responses 	
List of Organisation(s) commenting on this topic		
<ul style="list-style-type: none"> • Archibald Young Ltd • Clarendon Planning & Development for Barratt Homes • Colliers International for Tame Construction • East Dunbartonshire Visually Impaired People's Forum • Geddes Consulting for Taylor Wimpey (West Scotland) • Gladman Developments • Gray Planning for MacTaggart & Mickel Homes • Historic Scotland • Kirkintilloch Community Council • Lenzie Community Council • Lichfields for Extralifestyle Ltd • Montagu Evans for Philip Smith Commercials • National Federation of the Blind UK • Network Rail • NHS Greater Glasgow & Clyde (NHSGGC) • Persimmon Homes • Profilli Partnership for AE Holdings (Waterside) Limited • RFA Consultants (Boghead Road) • Scottish Environment Protection Agency (SEPA) • Scottish Natural Heritage (SNH) • Scottish Water • Strathclyde Partnership for Transport (SPT) • Waterside Community Council • Woodland Trust Scotland 		
Planning authority's summary of comments:		
<p><u>Issue 14 - What is the most appropriate way to ensure proposals for land use change or development in Hillhead and Harestanes reflect the priorities identified in the Hillhead and Harestanes Place Plan?</u></p>		
<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>	
1. Include the Place Plan priorities relevant to development and land use change in LDP2.	2. Cross refer to the Place Plan on a case by case basis at planning application stage	

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside



Agree with preferred option – 5
Agree with alternative option – 4
Other / Don't Know – 10

Summary of comments from individuals:

- Especially community learning and development, as well as community safety, to stop vandalism should be at the core for these areas.
- People who live, work and frequent these areas know what works and what does not in their area.

General Housing

- Greenfield sites should be protected.
- Consideration should be given to capacity of services and how more housing can be served.

S208 Bankhead Rd

- Very much against this site next to the monastery- would adversely affect way of life.

S326 Merkland School, Langmuir Road

- Very sensible site

S345 Waterside Road / Gartshore Road

- Great field full of biodiversity including rare orchids. Please do not allow development on this site.

Summary of responses from groups and organisations:

Geddes Consulting (Langmuir & Bankhead Rd/ Monastery Field & Waterside Road/ Gartshore Rd) – Supports Reasonable Alternative Option. The Place Plan does not form part of the adopted development plan. It is not listed as Supplementary Guidance or Planning Guidance and therefore has no formal planning status. The Place Plan and priorities therein have not been subject of formal Examination or formal consultation. It should not form an integral part of the decision-making process as proposed by the preferred option.

The Reasonable Alternative Option is considered to be more appropriate and reflective of the limited consultation undertaken. The Planning (Scotland) Act 2019 requires local authorities to ...take into account a registered local place plan. Consideration of the Place Plan on a case by case basis at planning application stage is more appropriate.

Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside
-----------------------------	-------------------------------------

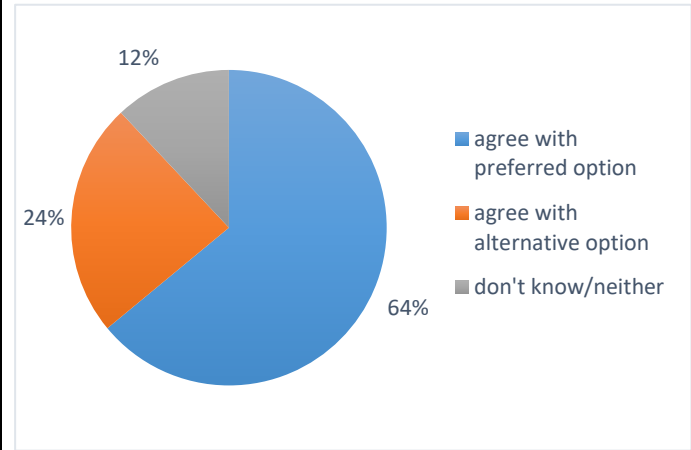
Persimmon Homes (Various Sites) - The incorporation of Place Plans in LDPs has the potential to make LDPs larger and more unwieldy as new Place Plans emerge over time and form new layers of LDP information. Additionally, local communities may not have the resources to review Place Plans every 5 years or alongside the LDP cycle whilst it will become confusing for the local community as to what they are engaging with. Place Plans should be material considerations referred to within and read alongside the LDP. It may be that some of the Place Plan priorities mirror that of the LDP. If the Place Plan was a material consideration it will allow professional officers to attribute appropriate weight to the Place Plan when an application is being determined.

Research compiled by Pinsent Mason, Appendix 1, highlights that Place Plans may not be truly representative of the local “communities” views. It demonstrates that whilst circa 90% of people voting on a Neighbourhood Plan in England support the plan only around 25-30% of the “community” turnout to vote. Better engagement in the actual LDP process will prevent the creation of Local Place Plans which are potentially not representative of the local view of how an area should be developed.

SPT – Agree with the preferred option. To not include the place plan priorities within LDP2 would lessen their status.

Issue 15 - How should the Kirkintilloch Town Centre Masterplan be reviewed and refreshed to update the long-term strategy for the Town Centre?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Produce a Town Centre Strategy that builds upon the existing Kirkintilloch Town Centre Masterplan, embeds the aspirations and actions of local community groups and aligns with the LDP and the strategies for the other Town Centres.	2. Update the Kirkintilloch Town Centre Masterplan using the same framework and without embedding into the LDP.



Agree with preferred option – 16
 Agree with alternative option – 6
 Other / Don't Know – 3

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

Summary of comments from individuals:

- Preferred option seems logical.
- Your Kirky is very proactive in terms of bringing back the allure of the old town while accentuating the historical fabric. They also listen to people and work towards giving people back what they ask for.
- Maintain the shared space. Despite carping by a vocal minority this has made the town centre a much more pleasant place to shop. Traffic speeds have reduced significantly and the wider pavements have even encouraged a continental street cafe experience (weather permitting). Safer for all. (including drivers). Parking issues need to be resolved. Removing the "free three hours" from the car park has created problems elsewhere and discouraged footfall. Reinstate free parking even if it is only limited to an hour.
- Health improvement for all is a sound bite. This idea needs to be developed and explained.
- Other Alternative Option - I've been proposing that Kirkintilloch's town centre should embrace and celebrate Kirkintilloch's industrial heritage. My proposal to build an interactive Giant Phone Box in Luggie Park, close to where the Lion Foundry manufactured them has just won the Future Towns Design Competition. I'm thrilled to say it has caught the imagination of folk in Kirky and elsewhere. It could be a game changer for the town. Rivaling the iconic Kelpies as a visitor attraction. Let's make it happen!
- Irrespective of what the people who live, work and frequent Kirkintilloch town centre want the council tend to do the opposite so what is the point in having an opinion or preference on this issue. e.g. shared space fiasco.

Summary of responses from groups and organisations:

Geddes Consulting (Langmuir & Bankhead Rd/ Monastery Field & Waterside Road/ Gartshore Rd) – Agree with preferred option

Kirkintilloch Community Council - The action plan and further work are all demonstrated on the Your Kirky website (www.yourkirky.com), and the below comments are based simply on those views and the views that have subsequently emerged since 2018. It should be noted that delivery of the below does not necessarily need to rest with East Dunbartonshire Council, and part of the response to the consultation was in agreeing a new partnership for delivery. However it is felt that the important issues raised should be incorporated into the future plans for the town, as without referencing them in the main issues report they are less likely to be delivered.

- Encouraging bespoke town centre offerings to encourage people to the town – a vibrant, successful town. Whilst the future of town centres remains uncertain, it is important that the maximisation of opportunity is undertaken. The community would like to see a vibrant town centre and to do that the development of small scale, independent and bespoke offerings should be supported.
- Regent Gardens – subject to a subsequent consultation, over 1,400 responses were received on the future usage of Regent Gardens. Whilst this project may be delivered before the new Local Development Plan is in place, it would be important that any residual items be carried forward into the new plan.
- Lighting projects – the consultation outlined that people would like to see enhanced lighting projects in the town e.g. like Royal Exchange Square in Glasgow.

Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside
-----------------------------	-------------------------------------

- Circular economy – success breeds success, and part of ensuring success is to generate and maintain a better local economy. Buying local and ensuring finance stays in the local economy where possible is an important part of growing a vibrant town.
- Growth of BID – KCC remain firmly supportive of developing a BID in Kirkintilloch. In addition to this consideration to a small grant scheme in relation to enhancing ‘shop fronts’ should be investigated.
- Night time economy – numbers of responses were received in relation to enhancing a night time economy, where traders and social venues remain open later and the town grows its entertainment offerings. Developing a regular monthly cinema delivered from the Town Hall has meant more people are now in the town in an evening. Further opportunity exists to grow this.
- Vacant lots – use of vacant lots in the town centre should be considered for a range of opportunities which meet the needs and aspirations of the community. Clear messages were received around developing a combined Community Centre/Youth Café/Arts facility in the town. Identification of suitable town centre land e.g. Luggie aqueduct for such purposes should be investigated.
- Accessibility and Safety – review the usage, requirement and availability of CCTV in the town. Consider making the town more accessible by having a clearly defined plan and execution of how street furniture is developed on Cowgate to assist the visually impaired, and an audit is carried out of accessibility of businesses in the town. Ensuring all play areas have accessible equipment for children with a disability.
- Marina – during the consultation and after it, many people have expressed a view that the Marina is not being utilised to its full potential. People would like to see the potential that is demonstrated at the Canal Festival grown throughout the year. Exploring options in relation to entertainment for the Marina and considering its wider potential for growth should form part of the plan.

SPT – Agree with the preferred option. This will provide consistency of approach and builds on community priorities.

East Dunbartonshire Visually Impaired People's Forum & National Federation of the Blind UK - Agree with the preferred option proposal for LDP2 to include a different land use strategy, but it does need to more specific, if the mistakes of the past Master Plan shared space designs are to be avoided. In particular, the strategy should be clearer as to how the centre and adjoining Townhead shopping area will work for pedestrians, people arriving by bus, and people arriving by bicycle in future. I suggest an alternative option wording below.

Issue 15 Other Alternative Option

The Council's new LDP2 access design strategy will be to remove existing shared space features that discriminate against blind and disabled people, and instead widen pavements, install more signal-controlled foot crossings along desire lines between key land uses, and provide for secure cycle parking and blue badge, drop-off and delivery parking. The Council will consider indicating in LDP2 giving support to any BIDS scheme to mitigate the harm done to business in the shared space part of Cowgate by making grants to such businesses to give face-lifts to frontages and invest in new shopfronts. The LDP2 Policy objective will be to give over-riding priority to people enjoying moving around the town centre on foot; to many more people arriving by bus in future; to blue badge holders needing closer access; to business deliveries; and to give people arriving at the centre by bike secure parking storage at key locations they can access safely from residential streets.

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

Reasons.

- To reflect the latest Scottish Government Climate Change Strategy changes in modal split and for the expectation that many more people will in future make trips by bus, rather than by private car.
- Access priorities, if stated in the LDP2 as above, would create a much more attractive centre for people to spend time in, rather than pass through.
- An access design strategy would also ensure that legally required anticipatory adjustments for blind and disabled people including wide kerbed pavements, frequent dropped kerb crossings, blue-badge parking and plentiful signal crossings are made throughout the centre.
- Re-balanced priorities for access to the centre would discourage cyclists from sharing pavement space, by cyclists being provided with physically secure and convenient parking locations they can identify on arrival at the centre, or as they move along its streets.
- Shoppers generally do not want to be constantly on the look-out for silent electric cars coming up behind them and crossing flush kerbs without warning, for cyclists weaving around them and through them on pavements, or for traffic to whom pedestrians are invisible when cars and delivery vehicle vehicles are parked across un-kerbed or low-kerbed footways.

Note: the new strategic vision for the town centre might translate into the following kinds of town centre management place-enhancing changes to Kirkintilloch's streets on the ground, amongst other measures.

Remove existing shared space:

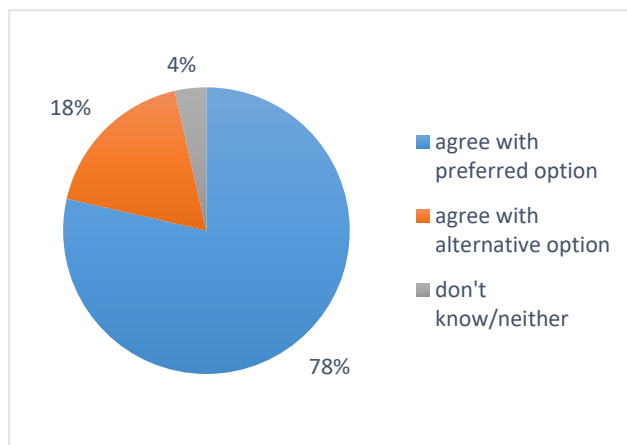
- Put in full height vertical kerbs to all pavements with frequent dropped kerb crossings for wheelchair and pram users; both to blue badge parking areas, and between - and at - signal crossing locations.
- Lower all raised tables, to allow at least the 60mm kerb faces each side of the road that it is known by national research that both cane and guide dog users can detect.
- Create the bus boarding kerbs required at bus stops for bus access ramps.
- Remove clutter, cycle racking and bike propping that prevents people from walking together; which clutter also obstructs or poses hazards for blind and disabled people.
- Narrow side street junctions such as that at Southbank Road with tighter turns and dropped kerbs that blind cane and dog users can line themselves up at.
- Partially pedestrianise streets like Broadcroft that mainly provide direct access on foot to major town centre facilities such as Smiths Hotel
- Widen pavements
- Reduce carriageway width to achieve wider pavements
- Where an alternative low speed route is available, make bus and other essential traffic one-way in narrow sections of street, to allow space for bus stopping as well as short runs of blue badge parking or delivery parking.
- Position enlarged bus shelters with seating and wheelchair and pram space inside each, clear of the pavement space people walk on
- Install more signal-controlled foot crossings along desire lines between key land uses
- Signal crossings across West High Street and Cowgate for access to the Library, Kelvin Court Housing, and the Museum; and across Union Street for access to the Town hall assembly and community facility.
- Relocate the signal crossings in Kerr Street and Catherine Street to be closer to the desire lines along the Cowgate pavements.

Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside
------------------------------------	--

- Add a new signal crossing for people on foot which is away from where cyclists are sharing the signal crossing at the canal bridge.
- Provide a signal crossing across Oxford Street behind the Regent Centre that all blind disabled and older people can use safely, including those living in new brownfield site developments built to the west of the centre in future
- Provide for secure cycle parking and blue badge parking, and kerbside drop-off and delivery parking
- Develop some cycle parking in secure cages away from pavements.
- Locate secure cycle parking in the Regent Centre and Sainsbury's Car
- Parks, where cyclists can arrive at the location along streets such as
- Shamrock Street which have a residential character.

Issue 16 - Should the LDP revisit vacant and derelict business land in Kirkintilloch and potentially re-allocate for alternative uses?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Reevaluate employment land/ business designations and allow some alternative uses to be developed to facilitate new business	2. Retain employment land and business designations on current brownfield sites.



Agree with preferred option – 22
 Agree with alternative option – 5
 Other / Don't Know – 1

Summary of comments from individuals:

- If the land is currently redundant and not in use, I expect you have done all you can so far therefore a review and possible relaxation or regulations maybe required and quantified. Just sitting on dead space is pointless to both council and community.
- Use these old areas for new houses instead of green land.
- The housing alternative for TJ House site seems much more sensible.

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

- Other Alternative Option - A reduced version of option 1. We need to keep accessible business land available within Kirkintilloch to keep jobs and business rates within the area. There is also a green imperative and moving business away from the town encourages more traffic and commuting to out of town sites.
- Other Alternative Option - See previous answer. Build Giant Phone Box on what was brownfield land.
- The councils efforts to regenerate these sites for business have failed .Wake up and smell the coffee retail parks were the death of town centres and the internet will eventually be the death of retail parks. Although I feel the housing being forced on local authorities is fundamentally flawed in that it is being lead by demand and not need I would far rather see these site used for affordable housing than remain unused ,with all the associated social problems that brings.
- Repurposed land helps meet housing targets but retains the character of the community
- Agree. Land that is not attractive for business use should be considered for housing or alternative uses subject to an assessment for failures in uptake.

Summary of responses from groups and organisations:

Archibald Young Ltd - The recent redevelopment of sites within the vicinity of the subject site demonstrates that where the Council takes a progressive, pragmatic approach to development outwith use classes 4, 5 and 6, the results are tangible, with new development on the ground and job creation. Had the Council not taken this more flexible approach, these developments and permanent jobs would either not have materialised or would have gone elsewhere. In support of this approach, it is worth highlighting relevant text within the Monitoring Statement, page 160, which states -

“Milton Road (LDP 13.25, Business Land Audit Site 23) – Continue to protect in Local Development Plan for business use. However, LDP2 could include the opportunity for retail or leisure uses on the vacant land subject to proposed uses not being able to locate in Kirkintilloch town centre and having specific locational needs”.

We would support the approach where LDP2, in respect of my client’s site, specifically includes the opportunity for retail and or leisure developments, for example drive through developments or trade counter type development to take place provided those uses are not suitable for or cannot be accommodated within the town centre.

Colliers c/o Tame Construction - The preferred option is correct (that employment land should be revaluated to allow some alternative uses to be developed to facilitate new business) and it is correct that Woodilee Industrial Estate should be included in this revaluation. However, they disagree that business use should be prioritised in the mixed-use allocation and that additional units should be provided.

Colliers International have been marketing the site for 17 years for business and industrial uses and over this extensive period there has been no commercial interest from potential occupiers. Throughout this time the site has lain vacant. Given the length of time that this site has been marketed unsuccessfully, it is clear that this is not a desirable site for potential business operators. Any speculative office/industrial development would therefore incur high costs to build/construct and this upfront speculative investment would never be recouped due to the level of rent that could be achieved. The historically proposed uses for the site are uneconomic and unviable, hence why the site has been vacant of approaching two decades. It is therefore

Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside
<p>essential that in the emerging Local Development Plan 2, this site is allocated for a more viable use so that this derelict, brownfield site can be brought back into meaningful use.</p> <p>The Employment, Land and Business Property Review (Ryden, 2012) anticipated this scenario stating “Kirkintilloch Gateway at Woodilee is attracting development interest (albeit from non-industrial/ office uses) illustrating the location's attractiveness. However, with the private business space market still struggling to recover, unless the public sector intervenes, it may be some time until an employment land use is realised.” The report went on to recommend that sites that were struggling to fulfil an effective employment land role would be better suited for an alternative use, a conclusion drawn and outlined seven years ago.</p> <p>There is a significant amount of vacant employment land across East Dunbartonshire (over 19.86ha as conformed in the Business Land Review 2018) and since 2012, planning applications for employment use classes 4, 5 and 6 have decreased significantly, with some of the major sites not yet being built out. This signals an oversupply of employment land and a lack of interest across the council area. Based on the current 19.86Ha, this represents a 30.6 year supply of business and industrial land. Therefore, there is a need for portions of this floorspace, such as the Woodilee site, to be released for other more viable and in demand uses. The Main Issues Report states that “housing- some housing, including affordable housing, may be acceptable on a limited portion of the site, provided that is compatible with existing business use and will enable further business development. Feasibility of housing suitability on the site to be considered.”</p> <p>We would contend that more than “a limited portion” should be considered acceptable for housing development. The 2014 Kirkintilloch Business Gateway Masterplan again allocated the Tame site for use classes 4, 5 and 6 and land to the south for housing. Since the publication of the masterplan, 900 homes are currently being built on land to the south and east of Woodilee Industrial Estate. Therefore, it is clear that the suitability of this location for housing has already been agreed. Both CALA Homes and Miller Homes have reported selling out of homes at Woodilee Village which indicates that demand is currently exceeding supply in the area. In contrast, the Tame site still lies vacant without any interest from Class 4, 5 or 6 operators for 17 years. This signals that the demand in and around the Woodilee Industrial Estate is for further housing and not business uses. The main issues report is silent on any other uses which we feel are essential to achieve the “mixed use development” proposed on the site. In particular, we believe that a portion of the site should also be allocated for retail development.</p> <p>Significant residential development has taken place on sites to the south and east of the Woodilee Industrial Estate, with further development planned over the next few years. This has led to a significant growth in population in the south of Kirkintilloch. We believe a discount foodstore would provide the existing and new community with easily accessible retail facilities, within walking and cycling distance to a large local catchment population. Initiative Road allows service vehicles ease of access without adding to traffic congestion in the town centre. Additionally, the foodstore would create new jobs within the area on a currently vacant site.</p> <p>Geddes Consulting (Langmuir & Bankhead Rd/ Monastery Field & Waterside Road/ Gartshore Rd) – Support Reasonable Alternative Option</p> <p>The principle of the re-evaluation of existing employment land / business designations to allow alternative uses is noted. However, these sites should only be released if the Council has a sufficient supply of business land as identified within the latest Business Land Audit. Appendix 2: Business Land Audit of the Monitoring Statement.</p>	

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

It is noted that some of these sites have been identified for potential partial residential development. It is noted that the Monitoring Statement (page 356) states that these sites ...have constraints which require further investigation to determine if they can be avoided or mitigated. The reallocation of these sites for alternative uses (specifically residential development) may therefore not be appropriate as recognised within the Monitoring Statement.

The retention of these sites for employment and business use (as per the Reasonable Alternative Option) is therefore supported, unless it can be demonstrated that these sites are effective and sustainable development when considered against other new housing sites promoted through the emerging LDP 2.

Montagu Evans (S346 Kirk Gateway) - Issue 16 of the Main Issues Report sets out a preferred option to reevaluate employment land/business land designations and allow some alternative uses to be development to facilitate new business. With specific regard to Woodilee industrial Estate / Kirkintilloch Gateway, this option includes a preference for a mixed-use development opportunity policy for the area, with a masterplan to protect existing businesses, promote limited housing development and improve infrastructure.

We support the direction taken in Issue 16, and welcome the opportunity to engage further with EDC officers and other landowners to help develop the Proposed LDP policy over our client's site and neighbouring landholdings. It is however our current preference that a more refined policy is created as part of the Proposed LDP which reflects the differences within the currently identified business and employment location.

We envisage that this modified approach will retain the existing employment land designation over the occupied industrial estate to the east of Woodilee Road where class 4, 5 and 6 uses can be protected and enhanced, while a separate development opportunity allocation applies over our clients land and adjoining areas to the east. This latter component would require a masterplanned approach to the redevelopment of the three landholdings in this area for a mix of specified uses, which can then deliver the regeneration of vacant and derelict land in this location.

It is relevant that Montagu Evans actively marketed the business park development site which formed part of the Woodilee Hospital masterplan area for commercial development from early 2015 to mid 2019, and did not receive any interest from developers or companies. The site benefited from planning consent for the erection of three two storey office pavilions, each extending to 1,320 sq. m. in size, (totalling 3,960 sq.m. or 42,625 sq.ft.) together with associated car parking and landscaping. The site formed part of the Kirkintilloch Business Gateway, promoted by East Dunbartonshire Council as a key business site and opportunity for economic development in the area in parallel with the expanding community. Notwithstanding this positive history and policy context, as a result of the lack of interest the site was ultimately sold to a 3rd party who we understand are now promoting it for alternative uses.

As a result of this marketing of the commercial development site, it remains our view that there is insufficient occupier demand for commercial space in this location to support any speculative development. Indeed, our agency colleagues are aware that Nova Business Park at Robroyston, a similar development but in a far superior location next to the motorway and closer to Glasgow, has struggled to attract tenants ever since it was developed in 2008 and a significant amount of space remains unoccupied.

Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside
<p>We therefore firmly believe that the prospects for commercial development at Kirkintilloch Gateway are extremely limited. This view is reflected in the consideration of Woodilee Industrial Estate (site 27) within the EDC Business Land Review, which highlights that the Woodilee Industrial Estate is effectively read as two separate locations, with the element to the east of Woodilee Road containing nine businesses which occupy a mixture of generally older buildings, some of which are in a relatively poor condition. To the west of Woodilee Road, the Business Land Review identifies that there are limited occupiers with a building in derelict condition.</p> <p>The Business Land Review considers our client’s site alongside neighbouring landholdings which together form the currently identified industrial and business land allocation, and concludes that EDC should consider zoning the sites for different uses with the potential to deliver a mixed-use development (para 6.184)</p> <p>This Review complements the EDC Business Land Audit, which finds that the entire Woodilee Industrial Estate is a category D business land site, i.e. one which is an active and which could be considered for employment-led mixed use development. This appears to us to be at odds with the conclusions of the Business Land Review, and is perhaps only applicable to the more intensively occupied industrial area to the east of Woodilee Road, which merits a focus of employment land policy to improve the its productivity and appearance.</p> <p>We do not consider that the area of land to the west of Woodilee Road, including that owned by our client, remains an active employment site and instead consider that there is instead merit in removing this area from the identified Woodilee Industrial Estate as a category E site. This would more appropriately allow the land to the West of Woodilee Road to be brought forward as part of a masterplanned approach for a range of uses defined in an appropriate LDP policy allocation.</p> <p>Lichfields for Extralifestyles (S346) - Agree with Preferred. The MIR states that the preferred option is to reevaluate current employment/business designations and allows some alternative uses where these alternative uses will help facilitate new business development. The sites which are to be reevaluated include S24, S100, S346 and S347 in Woodilee Industrial Estate / Kirkintilloch Gateway. Site S346 is our clients’.</p> <p>Scottish Planning Policy (2014) states (Paragraph 101) that: “Local development plans should allocate a range of sites for business, taking account of current market demand; location, size, quality and infrastructure requirements; whether sites are serviced or serviceable within five years; the potential for a mix of uses; their accessibility to transport networks by walking, cycling and public transport and their integration with and access to existing transport networks. The allocation of such sites should be informed by relevant economic strategies and business land audits in respect of land use classes 4, 5 and 6.”</p> <p>It goes on to confirm (Paragraphs 102 and 103) that: “Business land audits should be undertaken regularly by local authorities to inform reviews of development plans, and updated more frequently if relevant. Business land audits should monitor the location, size, planning status, existing use, neighbouring land uses and any significant land use issues (e.g. underused, vacant, derelict) of sites within the existing business land supply. New sites should be identified where existing sites no longer meet current needs and market expectations. Where existing business sites are underused, for example where there has been an increase in vacancy rates,</p>	

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

reallocation to enable a wider range of viable business or alternative uses should be considered, taking careful account of the potential impacts on existing businesses on the site.”

This can be summarised as follows:

- LDPs must allocate sufficient land to meet employment need and demand, as informed by economic strategies;
- These sites must be deliverable within 5 years;
- Regular business land audits should consider the effectiveness of sites;
- Where underuse is evident, new uses for underused sites should be considered and if appropriate new and more appropriate business sites identified.

In preparing the MIR East Dunbartonshire Council has, as recommended by SPP, commissioned an employment land review (GL Hearn 2019). This found that the market is buoyant with low vacancy rates but with negative demand for a variety of reasons.

The audit considered the various employment sites in the Council area. Site 27 is the Woodilee Industrial Estate, which encompasses the wider estate within which our clients’ and other vacant sites form part.

The conclusions regarding Site 27 are as follows:

“There are two large cleared sites, which have good accessibility onto Woodcroft Rd with a further smaller site to the west. Although the has good accessibility and is in a sustainable location, there does not appear to be market demand for a development of this scale as demonstrate by the previously cleared site. The remaining units which survive and the overall appearance of the industrial estate is poor. The Council should consider zoning the sites for different uses with the potential to deliver mixed use development.”

Our clients’ site, which forms part of Site 27 (GL Hearn) and is numbered S346 in the MIR has been marketed for office use since 2008 at the time which approval of reserved matters relating to office development on the site was secured. In the 11-12 years since there has been little to no interest in the site, with the exception of our clients’ who wish to pursue alternative uses.

The site has been allocated in the extant LDP as a Business and Employment site and subject to Policy 13. This policy is supportive of proposals in use classes 4, 5 and 6 on sites such as this. Alternative uses are only acceptable where a selection of criteria are met. Despite the active policy support for classes 4, 5 and 6 as well as flexibility in built into the policy to allow alternatives in certain circumstances, the vacant components of Site 27 in the GL Hearn study which includes MIR site S346 have yet to become occupied in line with policy aspirations.

With this in mind it is evident that, in line with SPP and the recommendations of GL Hearn in the EDC Employment Land Audit, the extant employment designation on land at Woodilee Road is no longer fit for purpose and its redesignation for alternative uses would help stimulate investment in this location as well as generate employment in itself.

Our clients fully support the identification of S346 and its neighbours in the Woodilee Industrial Estate and Kirkintilloch Gateway as a Preferred Housing Site Subject to Further Assessment.

We note the comments in the Council’s site assessment tables and comment as follows:

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

- Biodiversity Officer notes that the site is previously developed but has begun to naturalise with patches of grassland, scrub and ruderals. Nesting birds will utilise the site and development should seek to retain/create some scrub habitat.
Comment: We note the naturalisation that has begun to take place in the time since the site was prepared for development. Our client has appointed an environmental consultant to undertake a Preliminary Ecological Appraisal for the site which will establish the extent of any habitats that are forming and will make recommendations for incorporation into any design solution.
- Flood Risk Officer comments that there is pluvial risk and that the Flooding and Drainage Guidelines for Developers should be referenced.
Comment: These comments are noted. A positive drainage solution will be incorporated into any future development which will address surface water run off and adhere to best practice SUDS design.
- Arboriculture Officer notes that a Tree Survey Report and Arboricultural Impact Assessment is required to establish the trees for removal/retention.
Comment: This is noted and these reports will be undertaken and inform the design process.
- Environmental Health Officer highlights potential contamination and likelihood of industrial noise as factors which render the site unsuitable for development. As a result, an Air Quality Impact Assessment and Noise Impact Assessment are required.
Comment: Air Quality and Noise will be subject to survey and assessment to establish the site's acceptability to accommodate development. Mitigation will be embedded in the site layout and building design, potentially influencing orientation, acoustic performance and landscaping. The site is brownfield and will likely have been remediated to accommodate development as consented by planning permissions TP/ED/05/0040 and TP/ED/06/1294. The wider Woodilee development is predominantly residential whereas our clients' site was for employment use and may have been remediated to a different standard to the residential areas. As a result it may indeed be unsuitable for mainstream residential development with private gardens without further remediation. This need not however preclude higher density flatted development with factored and communal landscaped areas such as that proposed by our client. A site investigation will inform the design solution to ensure that future residents are not at risk of contamination.
- West of Scotland Archaeological Service confirm that it is unlikely that investigation will be required.
Comment: This is noted.
- Transportation comment that the site has access to bus stops within 400m but these are hourly and poor walking routes may mean that increased reliance on the private vehicle may occur. Improvements to pedestrian access to the town centre is identified as mitigation.
Comment: These comments are noted. As described previously, an Air Quality Impact Assessment and Transport Statement will be prepared to establish the accessibility of the site and mitigation required. It is worthy of note however that the nature of our clients' proposals, being age exclusive homes will be less likely to generate private vehicular trips and those that are generated will be less likely to be peak time trips. Furthermore, residents will be more likely to utilise public transport, regardless of its frequency.

In summary, our client supports the reallocation of land at Woodilee Road, reference S346 in the MIR, for alternative uses including housing and age-restricted housing (over 55s). They acknowledge the further assessment necessary to develop the proposals through to a detailed design which meets planning policy requirements and will continue a dialogue with officers of East Dunbartonshire Council as these progress. Any detailed design which emerges must ensure an acceptable level of amenity for future residents as well as

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

respecting the existing amenity afforded to current and future occupants of the remaining and neighbouring employment land.

Persimmon Homes (Various Sites) - There is an oversupply of employment/business land in East Dunbartonshire and low levels of take-up. The existing employment/business areas are competing with each other and we support the Council's recent decision to grant consent for housing on sites S111 and S226. Considering alternative uses can assist in providing a catalyst for the development of the site, which may include some commercial uses, and/or focusses commercial uses on the other sites – making them more viable.

NHS Greater Glasgow & Clyde (NHSGGC) - NHSGGC do not have a specific view on the proposals within issue 16, however, we are aware of the need to review the potential need for additional health related facilities, if this issue is taken forward. NHSGGC continue to support the need to further and detailed engagement in relation to the potential impact both existing and new developments may have on the delivery of healthcare.

Scottish Water - Should any land be re-allocated then please consult with Scottish Water on any such future uses. It is difficult for Scottish Water to provide details of infrastructure requirements for sites without knowing what the end use will be, however we will provide the best information we have available at the time to help with decision making and will revisit this as more details become available. Early engagement between the developer and Scottish Water is always recommended to identify any required upgrades and avoid unnecessary delays.

SEPA - We support a pro-active and adaptable approach in order to assist progressing re-development of vacant and derelict land, and hence we support the Preferred Option.

SPT – Agree with the preferred option. Promotion of alternative uses should consider the accessibility of the site.

SNH - Whilst we do not have specific comment on the potential reallocation of vacant and derelict business land to reuses, we would comment on the following sites as contained in this Issue as follows:

- **S24** - Woodilee Industrial Estate/ Kirkintilloch Gateway: A Development Brief should be produced/ be required together with sites S100, S346 and S347.
- **S100** - Woodilee Industrial Estate/ Kirkintilloch Gateway: A Development Brief should be produced/be required together with sites S24, S346 and S347
- **S346** - Woodilee Industrial Estate/ Kirkintilloch Gateway: A Development Brief should be produced/be required together with sites S24, S100 and S347.
- **S347** - Woodilee Industrial Estate / Kirkintilloch Gateway: Development Brief should be produced/be required together with sites S24, S100 and S346.

See also our comments relative to these sites under **Issue 17**.

We generally support in principle the remediation and reuse of vacant and derelict land over new uses in the Green Belt for example, as well as Temporary Greening of such sites while new or alternative uses are being found or considered. However, it is often the case that vacant/derelict sites as they currently are, potentially contain the highest levels of biodiversity in urban areas. This is often largely due to lack of disturbance or use by the public /people in any number. We therefore recommend that the development of vacant and derelict

Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside
------------------------------------	--

sites either at the above or other locations within the Plan area are preceded by appropriate surveys to establish whether the site has biodiversity value, particularly protected species that have licensing implications. This should be followed by a design that secures/retains the maximum possible amount of that biodiversity post-development.

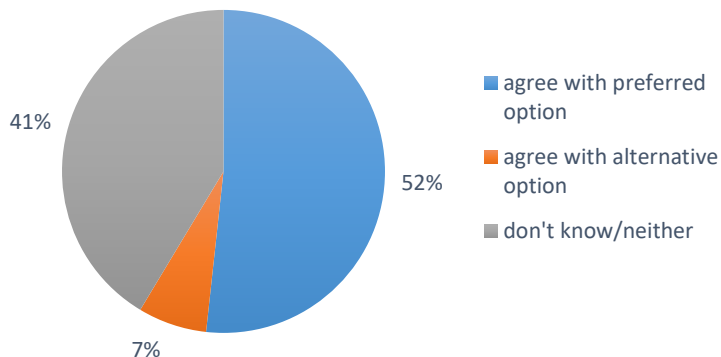
We further recommend that this be fully recognised and incorporated into the forthcoming Plan.

Issue 17 - Where should new housing in Kirkintilloch, Lenzie and Waterside be located?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
<p>1. Allocate the sites from the preferred housing package (see Issue 34) located within Kirkintilloch, Lenzie and Waterside, in addition to the sites within the current LDP and/or with planning consent:</p> <ul style="list-style-type: none"> • S24, S100, S346 & S347 Kirkintilloch Gateway (S24 100% affordable housing) – • S111 Former Tom Johnstone House (100% affordable housing) & S226 Whitegates Business Park (housing and business), Kirkintilloch • S326 Merkland School, Kirkintilloch (100% affordable housing). 40 homes. • S353 Moss Rd, Waterside (100% affordable housing). • S365 Langmuir Road, Kirkintilloch (potentially 100% affordable housing). • S366 Campsie View School, Lenzie. 28 homes. • S367 Former Lenzie Primary School, Lenzie (For noting only – site has planning consent TP/ED/18/0378 but unable to be included within draft 2019 Housing Land Audit). 20 homes. 	<p>2. Allocate the sites from the alternative housing package (see Issue 34), none of which are located in Kirkintilloch, Lenzie and Waterside.</p>

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside



- 30 preferred, 4 alternative, 24 don't know/other

Please explain your answer:

- No further land should be allocated for development in Lenzie. The impact of this on the proposals for the current LDP and LDP2 would be de-allocation of site 6.46 from the current LDP, draft housing Land Audit 2019, and LDP2. The reduction in homes does not compromise the legislative requirements of the council as these homes are more than compensated for in the proposal to change the use of other Brownfield sites in the authority with some for housing. The benefit of removing site 6.46 is in relation to protection against flooding, pollution, climate change, protection of wild life and retaining open land amenity space and this site should be protected. The current LDP and MIR consultation documentation made available by EDC and which will inform LDP2 will result in an over provision of both Market and affordable housing in the Kirkintilloch and Lenzie communities by comparison with the other communities referred to in the MIR 2019 and supporting documents. By focusing house building in one area the council has caused an over provision in this area and discriminates against this area.

With regard to Site 6.46 the council site assessment document in support of the MIR and HLA documents highlight some constraints but does not disclose how these constraints can be mitigated. The consultation documents and consequently the MIR 2019 documents fail to disclose and provide mitigation to the following significant constraints which can't be dealt with by the planning process relative to site 6.46 as the constraints refer to issues outwith the site in different ownership:

- Failure to comply with the legislative requirements to identify the site correctly.
- Failure to disclose that in order to access the site an extension to Meadowburn Avenue is required and that legislative requirement requires any prospective developer to apply to the council for Roads Construction Consent.
- Failure to disclose that the sole purpose of extending Meadowburn Avenue is to provide access to land for development and not to improve or enhance the road or foot way.
- Failure to disclose that in order to access the site a substantial new culvert is required to cross the Cult Burn. This requires any prospective developer to apply to SEPA for a license to do so and SEPA approval of their culvert plans.
- Fails to disclose the constraint that SEPA have a presumption against culverting .

Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside
------------------------------------	--

- Fails to disclose SEPA advice encouraging authorities to include in their LDP policies a presumption against further culverting of water courses and that should such a policy not be adopted that SEPA will presume against any such culvert.
- Fails to disclose the existence of Japanese Knot wood on the north and south banks of the Cult Burn. It's concerning that other council consultation documents consider the removal of controlling this invasive plant from council responsibility.
- Fails to disclose the existence of TPO 31 and the constraint that places on any construction in Meadowburn Avenue.
- Fails to identify the significance of the Cult Burn as a facilitator to the movement of wildlife throughout the area.
- Fails to disclose the requirement to remove native trees outwith the site and in other ownership significant to the wildlife and protected species that frequent the Cult Burn.
- Fails to disclose land required outwith the site is in other ownership and is legally left to local residents as open land amenity space as required by title deed burden.
- Remove Meadowburn Avenue site if access is to be from Meadowburn Ave and not initiative road.
- There has been significant development in the Lenzie area over the past 10 years leading to strains on public services. The sites outlined in MIR preferred option 1 seems a reasonable approach to the housing package in Lenzie. These sites would not impinge on the greenbelt which must be protected to ensure arable land, biodiversity and sense of place in the area. I would encourage planners to ensure clear guidance that areas outwith MIR preferred option 1 would not be considered for development during the period of LDP 2
- I don't have any proposed alternative but would be unhappy with either option. I wouldn't prefer the greenbelt to be built on, but also would prefer old school buildings to have an engaging use for the larger community. These kind of regeneration projects I believe are damaging the fabric of the town. Most of those proposed buildings would have more use with an 'upcycling' approach.
- Protect the green space. Quality of life is as important as mass house building.
- Merkland School land should be used for the location of the new ASN school. Not sold off cheaply to some developer. The site is flat and much more accessible than the proposed site on a well used football park and leisure facility.
- S111 and S326 Could be used for new ASN school thus preventing destruction of valuable Green Space.
- Develop within existing community.
- Protect green spaces and fields. Develop in brown land only.

KIRKINTILLOCH, LENZIE & WATERSIDE GENERAL

Note: New or updated information received from developers and key agencies on individual sites has been incorporated into the relevant site assessment, which have been updated separately.

Lenzie Community Council - Some sites are noted in the MIR for possible change of status (eg designation for housing). Three of these noted have already been dealt with (former Lenzie Primary, Whitegates and TJ House) and the present Campsie View site will presumably become eligible for consideration when it is closed. The area known as 'Kirkintilloch Gateway' has been marked for consideration of change of status to include an element of affordable housing. A member noted that Woodilee R. A. had been approached regarding a potential proposal in this area and it was agreed that information from the discussion with Planning be passed on. There are other sites which have been carried forward from the previous LDP, namely

Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside
-----------------------------	-------------------------------------

Woodilee Road (proposed Hotel), Meadowburn Avenue (there may be a proposal based on a different access) and a site east of Initiative Road which had previously been turned down on grounds of being in Green Belt. The status of these sites has not been proposed for change of designation.

Persimmon Homes - Whilst it is recognised that there is a need for affordable housing in Kirkintilloch, Lenzie and Waterside (this was raised during the MIR consultation) Scottish Government (SG) funding is not guaranteed during the proposed LDP cycle especially when Council budgets are shrinking. As the Council note private housing also assists in the delivery of affordable homes therefore private sites also need to be allocated to ensure that affordable homes can be delivered if SG funding is reduced or removed.

PHL build smaller more affordable private homes therefore if Persimmon sites are allocated there will be less need to release other greenfield sites and the homes will be more obtainable given the increases in local house prices over the past 5 years. Information from Zoopla highlights that the following changes in local house prices over the past 5 years:

Area	Average Price Paid	Current Average Value	% Change	Sales
East Dunbartonshire	£227,874	£255,594	20%	9,493
Kirkintilloch	£136,131	£155,834	21%	1,320
Lenzie	£269,440	£323,618	21%	1,112

Similar increases in house prices will make East Dunbartonshire and Lenzie less affordable. The following table details the average single person or couples combined income required to afford a home in Lenzie, Kirkintilloch or East Dunbartonshire as a whole:

Area	Average house price paid* (a)	Average income for a single person (a/4)	Average income for a single person** or couple (a/3.5)	Average income for a couple** (a/2.9)
East Dunbartonshire	£243,260	60,815	£69,502	£83,882
Kirkintilloch	£149,232	£37,308	£42,637	£51,459
Lenzie	£291,003	£72,750	£83,143	£100,345

* Source: Zoopla average price paid over the past 12 months.

**These figures relate to the ClydePlan mortgage multiplier.

The average income for East Dunbartonshire was £28,223 in 2012. Allowing for annual wage increases properties around the average house price in Kirkintilloch over the past 12 months are only obtainable for couples who would have a combined annual income of circa £56,446. Properties in Lenzie and the wider East Dunbartonshire area would be beyond their reach.

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

To address affordability there is a need for a greater supply of land to serve the local housing market to assist in providing new affordable homes locally and address general affordability in the Kirkintilloch, Lenzie and Waterside area.

In addition to affordability there are imbalances in the Lenzie and Kirkintilloch housing markets. The following table utilises data from the 2011 Census to highlight variations between Kirkintilloch, Lenzie and the wider East Dunbartonshire area and Scotland as a whole.

Finally, with regard to housing allocations generally, we wish to highlight that under paragraph 119 of SPP new allocations must be deliverable over the plan period. Of the proposed allocations within the MIR only one out of twenty-five has a Homes for Scotland member attached as a developer. As Homes for Scotland is an organisation which is responsible for over 90% private sector completions, this raises concerns around the genuine deliverability of the proposed sites. In order to combat declining supply, it is therefore necessary to rigorously assess the effectiveness of new allocations. To ensure that housing need and demand is met sites promoted by Homes for Scotland members should be allocated.

NHS Greater Glasgow & Clyde (NHSGGC) - NHSGGC do not have a specific view on the proposals within issue 17, however, we are aware of the need to review the potential need for additional health related facilities, if this issue is taken forward. NHSGGC continue to support the need to further and detailed engagement in relation to the potential impact both existing and new developments may have on the delivery of healthcare.

KIRKINTILLOCH

S07 – Langmuir

Geddes Consulting - Neither Preferred or Reasonable Alternative Option. The development strategy for the East Dunbartonshire local authority area requires modification to meet the growth estimates set out by the approved Clydeplan Strategic Development Plan (SDP) and Scottish Government. Kirkintilloch lies within the Strathkelvin and Greater Glasgow North East Housing Sub-Market Area as part of the Kirkintilloch and Twechar Local Authority Sub-Area. The housing supply target and housing land requirement of the Strathkelvin and Greater Glasgow North East Housing Sub-Market Area requires to be addressed as part of the Proposed Local Development Plan (LDP) 2.

The latest 2016-based Principle Household Projections illustrate that household growth across East Dunbartonshire from 2016 to 2032 is projected to be an estimated 4,181 new homes. Taking account of the existing need of circa 900 homes this equates to housing need and demand / housing supply target of 5,081 homes. This matter is discussed in detail in response to Issue 34: Housing Land Requirement.

Only one of the Preferred Option sites identified in the MIR is identified as a Preferred Option Site Allocation within the Monitoring Statement. This site at Merkland School (ref: 326) is only identified as having a capacity of 40 units. There is a strong demand for new private and affordable housing in the area, which will not be met by the Council's proposed additional 40 units. The Council is required to consider the release of additional housing sites within the Proposed LDP2 to meet the established demand.

It is noted that the Main Issues Report (MIR) Preferred Option identifies further housing sites ('Preferred Housing Sites Subject to Further Assessment'). The Monitoring Statement states that the other sites

Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside
<p>identified as part of the MIR's Preferred Option are ...not part of the SEA preferred option. These sites ...have constraints which require further investigation to determine if they can be avoided or mitigated, for example environmental constraints and amenity considerations. The Monitoring Statement confirms that it is ...possible that these sites may not be included within the Proposed Plan.</p> <p>It is therefore plausible that the Proposed LDP2 will only allocate 40 units for residential development within Kirkintilloch.</p> <p>The reliance of the MIR on sites which do not form part of the SEA preferred option, nor have been subject of suitable assessment, is not supported. The Council should be identifying sites that are free from technical constraints and able to make a contribution towards the provision of a generous housing land supply over the 10 year period to 2032. If following further assessment, it is identified that these additional sites are not suitable for development, the Council is required to allocate additional sites that are capable of delivering residential development.</p> <p>The Council has an opportunity to reconsider the proposed development at Langmuir, Kirkintilloch (Ref: S07). An updated Specialist Appraisal and Site Assessment Review for the site has been prepared and support this representation to the MIR. The Site Assessment Review confirms that the Council's Site Selection Methodology for identifying preferred and alternative sites for housing in the MIR requires further clarification. It is recommended that all sites submitted in preparation of the Proposed LDP 2 should be reassessed in order to provide a generous housing land supply over the 10 year period to 2032.</p> <p>In relation to Langmuir, Kirkintilloch (ref: S07), the updated Specialist Appraisal and SEA Assessments have been updated as part of the Site Assessment Review in order to assist the Council in its reassessment to identify additional housing sites as part of the Proposed LDP 2.</p> <p>The updated Specialist Appraisal (Appendix 1) highlights that there are no significant constraints to the development of the site. The site is effective and will be delivered within the period of the Proposed LDP 2. The Updated SEA Assessment (Appendix 2) demonstrates that the site should be considered to have an overall neutral/minor positive score against the SEA criteria. Accordingly, there are no planning or environmental reasons why Langmuir, Kirkintilloch (Ref: S07) should not be allocated for housing in the Proposed LDP 2.</p> <p><u>S57 – Gartshore Estate</u></p> <p>Deborah Carmichael - The Gartshore estate (S57) is another site put forward for significant development. Should this be developed, it would substantially reduce the possibilities for roaming the countryside locally; it would also negatively impact local wildlife and wetland habitat. There are local nature conservation sites on the grounds, Gartshore Moss and Grayshill Wood, Gartshore Woods, Kennel Plantation and Heronry Hill among other areas. Additionally, it would have a very major negative impact on traffic locally – Waterside Road is becoming more and more congested, with resultant pollution effects on the population living along Waterside Road. It would also put a strain on local school provision. We note Woodilee Village has found it impossible to get a bus service to serve that area of new development, and believe there could be a similar problem at Gartshore.</p> <p>Waterside Community Council - The Gartshore estate (S57) has been proposed for very major development. Should this go ahead, it would substantially reduce the possibilities for roaming the countryside locally; it would also negatively impact local wildlife and wetland habitat and be likely to damage Local Nature</p>	

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

Conservation Sites on the grounds. Particularly in view of other landscape losses, we believe this area could become even more important for the welfare of future generations. It could act as an important air filter, absorbing pollution from the nearby M90 and surrounding roads. And if EDC's current plans to build a school on the Waterside playing fields go ahead, many who currently walk there are likely to switch to the Gartshore Estate instead. With more and more farmland being lost to development, we may come to regret the loss of areas that could contribute to Scotland's food security in years to come (particularly as the cost of importing fruit and vegetables from Europe may well increase substantially post-Brexit, potentially making fresh produce unaffordable to poorer families). This is yet another reason for preserving the Gartshore Estate from development.

A major development at the Gartshore Estate would also have a very significant negative impact on traffic locally – Waterside Road is becoming more and more congested, with resultant pollution affecting the population living along it. More new development would also put a strain on local school provision. We note Woodilee Village has so far found it impossible to get a bus service to serve its needs, and believe there could be a similar problem at Gartshore.

S24/ S100/ S346/ S347 Kirkintilloch Gateway

Woodland Trust Scotland - S24, S347, S100 and S346: All these site allocations overlap areas of native woodland, identified on the Native Woodland Survey for Scotland, which are already fragmented. Further surveys of the woodland and its biodiversity value should be undertaken. This is already an area with some development on and the merits of afforesting the area should be considered alongside the merits of business development here. In the context of climate emergency and ambitious woodland creation targets priority and preference should be given to afforestation on this vacant piece of land, to better connect the woodland and improve the biodiversity value of the woodland.

Colliers c/o Tame Construction (S100) - Tame are of the view that the preferred option is correct (that sites from the preferred housing package located within Kirkintilloch should be allocated) and it is correct that Woodilee Industrial Estate should be included in this allocation. It is contended however that 100% affordable housing proposed on the site to the north of Tame's ownership is unrealistic in terms of viability for the owner of the land at S24. There is a concern that this will be the only housing allocation within the Kirkintilloch Gateway site and that our clients site at Woodilee will not be allocated for housing. It is preferred that the Woodilee Industrial Estate site is allocated for housing (as part of a retail and residential mixed use allocation) in isolation of the surrounding sites, with a reasonable percentage allowed for affordable housing, to be agreed with the planning authority.

Montagu Evans (S346) – 5.10 Further, Issue 17 of the MIR has regard to new housing development in Kirkintilloch, and identifies that our client's land at Kirkintilloch Gateway forms part of the overall preferred housing package, subject to further assessment to determine the extent of land suitable for development. We support this issue and consider that it lends weight to our suggested approach to Issue 16, whereby the area to the east of Woodilee Road is identified as a development opportunity, containing a specified mix of uses to be brought forward as part of a masterplanned approach.

5.11 It is relevant that Montagu Evans acted on behalf of NHS GGC in respect of the sale of land to housebuilders for the redevelopment of the nearby Woodilee Hospital site. We are therefore well aware that this location is highly attractive to both developers and residents, and we expect that there will be significant

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

interest in residential uses in this area. We consider that the opportunity for residential development on the area to the west of Woodilee Road will be more significant than the 'limited portion' set out in the MIR at issue 16, and that this should also be reflected in the emerging policy.

We support the premise of issues 16 and 17 of the EDC Main Issues Report to revisit vacant and derelict business land in Kirkintilloch, including that at Woodilee Industrial Estate, and re-allocate it for alternative uses, including housing. We have some specific views as to how this emerging LDP policy may be formulated, and consider that any emerging policy should expand the focus on residential led regeneration of the vacant and derelict brownfield land over the next plan period, especially against the background of a clear lack of demand for class 4, 5 and 6 uses in this location.

Lichfields (S346) - As per our response to Issue 16 and for the same reasons, our clients are fully supportive of the reallocation of site S346 and its neighbours S24, S100 and S347 in the same area as potentially suitable for residential development, including housing for older people.

These would make use of land, which is evidently unsuitable for its current designation. It would also direct new development for which there is need and demand to previously developed brownfield land. This is supported by SPP (Paragraph 40) and NPF (Paragraph 2.21) which both support the reuse of previously developed land for new uses, and Clydeplan which supports this as part of its compact city region model.

S200 Gartconner and S348 Wester Gartshore

Deborah Carmichael - For many of the same reasons, traffic, pollution, strain on local infrastructure, loss of wildlife habitat, that I believe development at Wester Gartshore (S348) and Gartconner (S200) would be undesirable.

Waterside Community Council - For many of the same reasons (increased traffic on Waterside Road and resultant pollution, strain on local infrastructure, devastating loss of wildlife habitat, loss of valuable farmland, etc.), we believe development at Wester Gartshore (S348) and Gartconner (S200) would be very damaging for the area. East Dunbartonshire was recently rated the best place to live in Scotland; we must ensure we do not destroy all the things that contribute to quality of life in East Dunbartonshire and that made residents so positive about life here.

Persimmon Homes (S200) - When responding to planning application TP/ED/19/0050 for housing at Whitegates in Kirkintilloch the Council's Housing Department advised "Given the level of need for affordable housing in Kirkintilloch and limited housing supply, Housing Services are supportive of housing developments in the local area and in particular the provisions of new affordable housing." As well as providing private homes the development will also include privately funded affordable homes in line with council policy. Based on the site's potential in accommodate circa 150 new homes this would equate to 60 affordable units (25% affordable on-site and 15% unsubsidised affordable homes). Furthermore, these can be delivered through one landowner without the need to form equalisation agreements, or similar, with a number of landowners.

- The Council have prepared the Inner Green Belt Boundary Review of the East Dunbartonshire Green Belt. The document does not take account of the GB in relation to this site despite there being an on-going housing development opposite (TP/ED/14/0008 and PPA-200-2027). The GB review

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

accounts for land to the north and south. In order for the Inner Green Belt Boundary Review of the East Dunbartonshire Green Belt to be completed, the Gartconnor site must also be assessed.

- There are limited new housing opportunities to address demand for housing in Kirkintilloch and the wider Lenzie and Waterside area. Kirkintilloch is constrained by topography, watercourses and Lenzie to the south. The green fingers extending into the town associated incorporating areas such as Merkland Nature Reserve are a characteristic of the area and will not be compromised by this development where indicative proposals incorporate a Green Belt buffer to the south. The latter was also a welcome feature in the Council’s Committee report where the local area has an identified need for open space.
- As recommended by the Council’s biodiversity specialist in the Monitoring Statement Appendix 7 – Site Assessment the mature trees to the east, along the Core Path, can be maintained and hedges around the edge of the site augmented. The Core Path will be retained and planting enhanced in line with the Council’s Transport assessment of the site within Monitoring Statement Appendix 7 – Site Assessment.
- When the development of the site for housing was considered by the Reporter at appeal previously (PPA-200-2027) they recognised that infrastructure constraints could be overcome this is supported by the fact that Scottish Water, SEPA and the Council’s Flooding and Drainage Officers did not object to the proposals. Additionally, the combination of a roundabout access and bus stops to the north as well as the adjacent school meant that the site was accessible and couldn’t be regarded as peripheral. Furthermore, it has been demonstrated previously how topographical constraints can be addressed by focusing development on the northern two thirds of the site and augmenting the southern and eastern edges of the site with planting/parkland to establish a new Green Belt boundary and support the green network.
- The Council acknowledged in their Committee report that “The development will have a less significant visual impact beyond the immediate locale as topography, existing development and landscape features limit the number of existing viewpoints to which the proposal might intrude.”
- Within the Monitoring Statement Appendix 7 – Site Assessments Roads Appraisal the Council advise that the site has poor access to public transport. There is however now two bus stops located on the site frontage with the B8048 making the site accessible by public transport. During the consideration of the previous application both the Council’s Neighbourhood Services (Traffic) and Transport and Access Teams offered no objection to the proposals subject to conditions.

Persimmon Homes (S348) - When responding to planning application TP/ED/19/0050 for housing at Whitegates in Kirkintilloch the Council’s Housing Department advised “Given the level of need for affordable housing in Kirkintilloch and limited housing supply, Housing Services are supportive of housing developments in the local area and in particular the provisions of new affordable housing.” As well as providing private homes the development will also include privately funded affordable homes in line with council policy. Based on the site’s potential in accommodate circa 350 new homes this would equate to 140 affordable units (25% affordable on-site and 15% unsubsidised affordable homes). Furthermore, these can be delivered through one landowner without the need to form equalisation agreements, or similar, with a number of landowners.

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

The Council have prepared the Inner Green Belt Boundary Review of the East Dunbartonshire Green Belt. The document does not take account of the GB in relation to this site despite there being an on-going housing development opposite (TP/ED/14/0008 and PPA-200-2027). The GB review accounts for land to the north and south. In order for the Inner Green Belt Boundary Review of the East Dunbartonshire Green Belt to be complete the West Gartshore Farm site must also be assessed.

There are limited new housing opportunities to address demand for housing in Kirkintilloch and the wider Lenzie and Waterside area. Kirkintilloch is constrained by topography, watercourses and Lenzie to the south. The green fingers extending into the town associated incorporating areas such as Merkland Nature Reserve are a characteristic of the area and will not be compromised by this development where indicate proposals incorporate a Green Belt buffer to the south and east. The site represents an opportunity to deliver a planned finger of developing to the east of Kirkintilloch on a bus route adjacent to the school.

As recommended by the Council’s biodiversity specialist in the Monitoring Statement Appendix 7 – Site Assessment the existing landscaped boundary features will be retained and enhanced whilst the woodland and woodland edge buffer sought ties in with the indicative masterplan for the site. The mature trees and hedges along the Core Path that runs through the site will also be retained and augmented.

When the development of the western section of the site for housing was considered by the Reporter at appeal previously (PPA-200-2027) they recognised that infrastructure constraints could be overcome this is supported by the fact that Scottish Water, SEPA and the Council’s Flooding and Drainage Officers did not object to the proposals. Additionally, the combination of a roundabout access and bus stops to the north as well as the adjacent school meant that the site was accessible and couldn’t be regarded as peripheral. Furthermore, it has been demonstrated previously how topographical constraints can be addressed by focusing development on the northern two thirds of site S200 and augmenting the southern and eastern edges of the site with planting/parkland to establish a new Green Belt boundary and support the green network. These principles can be applied to this site also.

Within the Monitoring Statement Appendix 7 – Site Assessments Roads Appraisal the Council advise that the site is over 1000m from bus stops. This is incorrect, new bus stops have been formed to the north west of the site on Waterside Road (B8048) making the site accessible by public transport. During the consideration of the previous application (TP/ED/19/0050) for the western section of the site the Council’s Neighbourhood Services (Traffic) and Transport and Access Teams offered no objection to the proposals subject to conditions.

S339 Sadlers Brae

Waterside Community Council - This is another area of green belt that should be protected for the sake of local residents, wildlife and to avoid the sacrifice of yet more farmland that may have even greater value to us in the future than anyone yet knows.

Clarendon Planning & Development for Barratt Homes (Kirkintilloch East) - The MIR’s preferred option is for allocation of eleven sites in the wider Kirkintilloch area. It is noted that:

- All eleven sites are within the urban area, with ten brownfield and one greenfield.
- Six of the sites (S111, S226, S24, S100, S346, S347) are currently zoned for business/ industry within the adopted LDP including four sites at Kirkintilloch Gateway (capacity to be confirmed), Tom

Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside
<p>Johnston House (stated as 90 units but pending EDC Housing application for 87 units) and Whitegates (stated as 85 units, pending Persimmon application for 84 units).</p> <ul style="list-style-type: none"> • Three sites (S326 - Merkland School, S366 - Campsie View School & S367 - Lenzie PS) are former school sites with capacities of 40 units, 28 units and 20 units respectively. • One site (S353 - Moss Road) is a small area of hardstanding/amenity ground including garages with capacity for 12 units (proposed as 8 flats and 4 houses) • One site (S365 - Langmuir Road) is greenfield open space within the urban area with capacity for 18 units. • The MIR preferred option therefore focuses the only significant scale of housing delivery on two locations: Tom Johnston House and adjoining Whitegates Industrial Estate, plus Kirkintilloch Gateway. The balance of supply is made up of small-scale 'windfall' sites. <p>Given the status of the wider Kirkintilloch area as the main population centre for East Dunbartonshire, the preferred allocations do not provide a wide range and choice of housing opportunities over the plan period. The MIR's alternative option does not include any additional housing sites in the wider Kirkintilloch area.</p> <p>When assessing the indicative tenure split across the preferred sites, the only private supply is proposed for Whitegates (stated as 63 units but pending application is for 51 units), Kirkintilloch Gateway (c.30 units), Campsie View (21 units) and Lenzie Primary (15 units). This provides for a total of just 117 private homes over the whole plan period.</p> <p>It is considered that further housing opportunities should be identified in the Proposed LDP to allow for a greater range and choice of locations (majority of preferred supply also being flatted units) and scope for further private homes which can generate additional affordable homes supply via the Council's affordable housing policy percentage requirement.</p> <p>As noted in the findings of the Planning Appeal (ref.PPA-200-2027) at Braes O'Yetts Farm on the eastern edge of Kirkintilloch, the reporter stated that urban expansion into greenfield land could avoid adverse effects on the purpose of the Green Belt and could also be accessible. The demand for new housing requires greenfield locations to be included as housing allocations at Kirkintilloch to provide greater range and choice, on the basis that proposed sites can be planned sustainably.</p> <p>Barratt Homes therefore do not support either the preferred or alternative options for housing sites at Kirkintilloch and propose that additional greenfield sites are allocated. The proposed site at Kirkintilloch East (Site Ref.S339 - Saddlers Brae) and how mitigation measures can address points raised in the Council's Site Assessment is addressed below.</p> <p>LENZIE</p> <p><u>Greenbelt between Lenzie & Auchinloch/ Lenzie Hospital</u></p> <p>Niall Sommerville - I am writing to add my support to a specific element of the Main Issues Report, namely "MS Appendix 3 -Green Belt Review" and the continued classification of K&L5 as an important piece of green belt land. This is in addition to my more substantive response previously submitted. I welcome the classification of K&L5 as an important piece of green belt and would be keen to see its continued incorporation as protected green belt in the new LDP. In doing so this will give residents reassurance that this</p>	

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

land won't be developed and that the council is supportive of green belt and living its environmental messaging. This area of land provides an important natural boundary to Lenzie and helps prevent urban sprawl, ensuring the character of the town is preserved. It provides well utilised fertile agricultural land and a booming habitat for local wildlife and fauna which includes deer, hares and birds of prey. Any development on this land would have a significant detrimental impact on the environment - removing arable land and natural habitat, releasing carbon from the soil without the carbon capture of crops, creating pollution through increased traffic and homes including impact of building materials. Finally, the slope of the land means that any development would create a substantial flood risk for adjoining houses as water would run straight off into them. As such, I am pleased to see the clear need for this to remain protected as green belt has been identified and welcome this being adopted within the LDP, providing guarantees that it will not be utilised for development.

Ross Burnside - Many thanks for replying to my email about Stewart Milne's land on the southern edge of Lenzie. Earlier in the year I suggested this large area as suitable for development and I hope it will be included in your Main Issues report. Stewart Milne has owned the land since 1992 after John Lawrence builders went bankrupt. Lawrence tried to develop the land back in the 1980's, his appeal went all the way up to then Secretary of State who rejected the application.

The land lay fallow for well over 20 years until 2016 when farmer Willie Gray from Kirkintilloch was given a tenant lease. It is not productive farm land with poor soil consisting of much clay and in 2017 the entire crop could not be harvested and was ploughed back in. This area has become a regular shooting ground for those who take pleasure in shooting pigeons and crows under the pretence of "ongoing pest control". It started in 2016, got worse the following year and in 2018 was a slaughtering over months of continual shotgun firing. It has been reported to SNH and Police Scotland; sadly nobody is interested as it is "all above board". This land can be better used, and Lenzie badly needs a new secondary school. Initiative Road can easily cope with a new road/roundabout connection. Development of the field directly behind Millersneuk Ave and Crawford Ave is my concern due to the probability of increased flooding of properties to the north. A compromise could be to retain much of this field as a wildlife corridor linking to Millersneuk Wetland which is a haven for wildlife. A heron appears almost everyday at the Wetland, buzzards and sparrowhawks frequent this area, kestrels and barn owls have also been seen hunting, a sighting of a red kite, foxes and occasionally hares are seen too. The surrounding residential homes and gardens, trees and hedgerows are home to many small bird species. Four times the gunners were out last week and there is nothing that can be done to stop them working around the hedgerows and fields with their weapons. It's time for a change of use.

General

Lenzie Community Council - Working from the correct MIR document, we can recognise the sites under consideration, namely:

- S24, 100, 346, 347 Kirkintilloch Gateway (supermarket was proposed here but rejected on the basis that the land had not been zoned in a way that permitted a supermarket)
- S111, 226 Whitegates and TJ House
- S366 Campsie View
- S367 Lenzie Primary

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

It is not clear to us what housing may be allocated to these sites (except TJ House and Lenzie Primary where we have seen Planning Applications). The other question is - what is the status of certain other sites, which were probably in the previous LDP. These sites are:

- Woodilee Road (plans for housing and then a hotel were advanced and rejected. A requirement to replace trees is still extant)
- Meadowburn (where again a plan was rejected, but we are aware that there are moves to submit a new plan with a different access)
- Lindsaybeg Road, east of Initiative Road (where a plan was rejected due to green belt issues)

At the moment we are not in a position to comment and it would be useful if we could have a phone discussion of these questions and any other issues of which we need to be aware.

LDP 6.46 Meadowburn

Neil Gray (For Mactaggert and Mickel) – Agree with Preferred Option. We agree that the additional housing sites listed should be considered in addition to existing housing sites already identified in the adopted LDP and/or sites that have planning consent. However these additional sites should not be seen as replacements for existing housing sites already identified in the adopted LDP - unless there is a case made by the Council which justifies the need for replacement.

S46 Boghead Road

RFA Consultants

New Housing in Kirkintilloch, Lenzie, and Waterside should be located on sustainable sites which provide the opportunity for community benefits and meet the objectives of the LDP. Our proposal at Boghead, Lenzie meets these aspirations and is therefore promoted through the formative stages of the new LDP and should be included in the proposed LDP.

The housing would include a generous provision of social housing. The development would also include a new Care Home for 80 residents and Assisted Living accommodation for 89 persons. The site would respond to the Vision for East Dunbartonshire, meet LDP Objectives and Community Objectives.

The proposed development will provide a range of tenures and housing types which will in turn satisfy local needs. 52 new units would be proposed, and these would include a mixture of both detached and semi-detached housing. 25% of them would be affordable homes in order to comply with 'Policy 6: Creating Inclusive and Sustainable Communities' of the LDP.

Additionally, the previous LDP Examination Report published in noted that the site is highly accessible, within easy walking distance of bus stops and Lenzie Train Station and also within a few hundred metres of core paths, open space and recreational space. Evidently East Dunbartonshire Council has agreed that the site is in a highly sustainable location.

The site identified to the west of Lenzie would be suitable for the development of a Community Recreational Facility/Community Hub/Sport Facility, and new provision for open space as well as high-quality building for communal meeting and changing room purposes. The development would include 1 sports pitch, 2 tennis

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

courts, 1 sprint track and car parking for 200 vehicles. In order to finance the facility and improvements an enabling development of housing will be included in the proposal.

The proposals would act as enabling development for community facilities and would be implemented in partnership with the Council. Early discussions have taken place with EDC on this matter.

An Indicative Development Framework is appended to this representation.

Having regard for the Monitoring and Environmental Reports as part of this MIR, it can be concluded that the site at Boghead, should be considered for allocation and included in the Proposed LDP as a housing and community site.

The identified site would be suitable for the aforementioned development because it is located on the periphery of Lenzie to the west, near the A803 and the B812. This would make it highly accessible from the town and the wider East Dunbartonshire region. Additionally, the proposed housing would be a logical expansion of an existing residential area allowing integrated growth through a high-quality masterplan approach.

It is acknowledged from the Environmental Report that the site falls within the green belt and overlaps the Lenzie Moss Local Nature Reserve (LNR) and the Lenzie Moss Local Nature Conservation Site (LNCS) both of which would be managed through the development process. It is considered that the benefits of the development outweigh the value of the relatively small proportion of green belt, LNR and LNCS to be lost. Additionally, appropriate actions could be taken to preserve the nationally rare Bog Rosemary which is situated to the south west of the site. A sensible design could adequately deal with the mitigation of all nature conservation and ecological matters.

S181 Blacklands Place Southeast

Gladman Developments - We do not agree with either the Preferred or Reasonable Alternative option in relation to Issue 17 and specifically new housing in Lenzie. We refer the Council to our response to Issue 34 which provides a detailed analysis and justification for the need for additional housing sites to be identified by the Council. The proposed site at Blacklands Place, Lenzie (MIR Site Ref: S181) that Gladman are promoting is an effective site within a sustainable location. We also refer to our representations on the proposed site specifically which should be read alongside our response to each MIR Issue.

We therefore recommend that the Council's housing allocations in Kirkintilloch, Lenzie and Waterside be amended to include the site at Blacklands Place, Lenzie (S181).

S201 Crosshill Road

Persimmon Homes - The site will deliver smaller more affordable private homes in a settlement with above average house prices for East Dunbartonshire, see above. This will provide a more diverse range of homes to cater for a range of demographics and also allow people to downsize and stay in the area.

As well as providing private homes the development will also include privately funded affordable homes in line with council policy (25% affordable on-site and 15% unsubsidised affordable homes). Furthermore, this can be delivered through one landowner without the need to form equalisation agreements, or similar, with a number of landowners.

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

Within the Monitoring Statement Appendix 7 – Site Assessments Biodiversity Appraisal the Council advise that the impact on migratory geese requires to be assessed and the extent of peat on-site determined. These were issues raised by the DPEA Reporter when considering the site previously and in support of the allocation within LDP2 a Winter Bird Survey and Wetland and Peat Briefing Note were submitted. These do not appear to have been considered. The submitted supporting documents confirm that developing this site for housing will not unduly affect wintering birds which may periodically use the site or peat dominated sub-soils. Additionally, the site is also over 100m from the LNCS. The Persimmon proposal also augments the existing boundary treatment and proposes a new tree belt. The latter will augment the existing, fragmented Green Belt (GB) boundary which is weak to the north and south of Heriot Road. A new tree belt will filter views to the developable section of the site, as detailed in the indicative layout, whilst existing trees in Lenzie will provide a backdrop to ensure that none of the new homes breach the skyline. Post allocation a Landscape and Visual Impact Assessment will be submitted in support of the application to confirm this.

The site is also well connected given its proximity to Lenzie rail station and the M80. As the transport review notes the site is close to a railway station and a number of regular bus services pass through Lenzie to Glasgow.

The site is also close to local amenities, such as Lenzie Bowling Club and Lenzie Golf Club whilst also providing a play area to serve both the development and wider area given that the only local play area is in Alexandra Park.

Waterside

General/ Village Identity? Greenbelt

Online questionnaire:

- I oppose the building of the ASN school on Green Space in Waterside. Whitegates /Tom Johnstone house is more accessible, has access to more amenities and does not destroy the football pitch which as council tax payers we all contributed approximately £100,000.

Deborah Carmichael - Once again we in Waterside are faced with the loss of our Village identity with the ever encroaching ring of housing developments to the West, South West, East and North of our home. It actually seems that there will be no greenbelt or open space left to our community. I must therefore protest all proposed development in our vicinity on the grounds that primarily all these places and especially the utilisation of our horses field at the beginning of the village, will rob us of our identity. Development will impose heavy penalties on our road access massively increasing pollution into our environment and being harmful to the concept of flowing wildlife links and green space in this area. I enclose a shot of Bankhead Road taken last week when there was a small flurry of snow on Bankhead Road. The resulting traffic jam took a very long time to disperse meanwhile cars sat engines running in the very narrow only road access into the village. As a resident of Waterside I fully support efforts to protect the natural environment and the green belt, support sustainable transport, reduce carbon emissions and protect flood plains from development. I also support the development of brownfield sites. I fully support all efforts to protect all wildlife, including Trees. I believe the local population should have easy access to countryside in which to roam and feel at one with nature for it is well known that such activities have significant health benefits.

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

Waterside Community Council - fully supports efforts to protect the natural environment, the green belt and open space; support sustainable transport; reduce carbon emissions; and protect flood plains from development. We support the development of brownfield sites. We would also encourage all efforts to protect wildlife, including pollinators. We believe local populations should have easy access to green space in which to roam and feel at one with nature. (Access to nature is known to provide significant health benefits.) We also believe it is vital for communities such as Waterside to retain their local identity. For the sake of long-term food security, we believe farmland should be safeguarded from development as far as possible.

S208 Bankhead Rd & S345 Waterside Rd/ Gartshore Dr

James Carmichael - In relation to the proposed development plan - in many respects the questions posed by East Dunbartonshire Council in its questionnaire and in the course of discussing the Local Development Plan are the wrong questions. The Scottish - and National - government have agreed that the state of our natural environment is critical and the most important factor affecting our environment is land use. Only a tiny percentage - less than 7% of land in Scotland has escaped the effect of development or use in one manner or another. As a result – the question we should be asking - the question our local government should be asking on our behalf - is - ‘what can we do to reduce and restrict changes and interventions that will have a damaging affect on our natural environment?’ Yes, that means protecting the green belt, it means supporting sustainable transport, reducing carbon emissions and it means preserving what little open land there is which has not yet been developed. Increased road traffic plays an important role, and its effect on public health should not be overlooked. Groups of cars lining up at busy junctions, pouring out fumes and particulates represents a major health hazard and the pollutants emitted may well play a role in causing asthma and in reducing the biomass of insects. So when considering new developments and house-building, the Council should resist attempt to develop areas where the impact on road traffic will be significant. At the same time, even small areas of open, green, undeveloped land can and do make an important contribution to reducing the impact of pollution. That being the case, in considering the possibility of developing S208 and S345, although it seems the Council has recognised that these are small but important areas of the green belt, there is pressure to allow development on these sites. This should not be accepted. S208 is used for grazing a single horse, and the result is a perfectly balanced small piece of meadow - with a range of wild flowers which thrive in the conditions such as the Butterfly Orchis. And of course, that field makes an important contribution to the air quality and general biodiversity, linking the Luggie Water wildlife corridor to open fields that stretch all the way to the Gartshore estate, a vital link for wildlife. I recognise that East Dunbartonshire Council has, in the past, resisted attempts to develop areas around Waterside, and that building companies have successfully appealed against the Council’s decision. It does not help the Council’s case that in regards the Waterside Park, the Council is proposing to breach its own policies on the use of green field sites by building a School on the park. It should be noted that Waterside does not have any designated park land. The village has access to the Luggie Water, but access is limited to those who are fit and able. The only green space available to residents is the Park which the Council has earmarked for a building project. This decision may well open the opportunity for building companies to regard East Dunbartonshire’s policy regarding the green belt as open to challenge, since the Council itself sets the policy aside when convenient. It is time the Scottish government, and local authorities woke up to the crises our wildlife and green spaces are facing. Unless determined efforts are made to preserve and protect all green space - there will come a time, in the very near future, when wild species populations will collapse, and we will leave a sad legacy for future residents who will consider the irresponsible actions of our current political leaders with despair and contempt.

Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside
<p>Deborah Carmichael - As on previous occasions, I am strongly opposed to development of the sites known as 'the Horse's Field' (S208) and 'the Cornfield' (S345). These areas of greenbelt allow Waterside to keep its village identity something that is very important to Waterside residents. The Horse's Field has a particular role to play in maintaining an oasis of calm for contemplation at the Carmelite convent, which is extremely important to the Carmelite nuns and their congregation. The two fields also provide a vital wildlife corridor at a time when we are taking over wildlife spaces at an alarming rate and having a very damaging impact on Scottish wildlife, something our children, grandchildren and great-grandchildren will bitterly resent us for in years to come. Please note that there are definitely adders, a protected species, in the Cornfield site. There is a burn on the Cornfield site, the Moss Goat Burn, which might well cause flooding problems if more hard surfaces were put down near this waterlogged moss. There is a record that a construction vehicle sank into this area back in the fifties and is still to be found underground.</p> <p>Waterside Community Council - As on previous occasions, Waterside Community Council is strongly opposed to development of the sites known locally as 'the Horse's Field' (Bankhead Road, S208) and 'the Cornfield' (Waterside Rd/Gartshore Rd, S345). These areas of green belt allow Waterside to keep its village identity by preventing coalescence with Kirkintilloch – something that is extremely important to Waterside residents. The Horse's Field has a particular role to play in maintaining an oasis of calm for contemplation at the Carmelite convent, which is extremely important to the Carmelite nuns and their congregation. It is also of enormous scenic/aesthetic importance at the entrance to the village and helps ensure Waterside retains the semirural feel that is so important to villagers and to our feelings of wellbeing. The two fields also provide a vital wildlife corridor at a time when humans are taking over wildlife spaces at an alarming rate and having a very damaging impact on our Scottish wildlife (something our children, grandchildren and great-grandchildren will bitterly resent us for in years to come).</p> <p>Please note that adders (a protected species) are known to be present on the Cornfield site. There is a burn on the Cornfield site (the Moss Goat Burn) and a waterlogged moss area. We believe there is as a result a potential for flooding problems should this area be built on.</p> <p>Geddes Consulting for Taylor Wimpey (S208) - Neither Preferred or Reasonable Alternative Option. The development strategy for the East Dunbartonshire local authority area requires modification to meet the growth estimates set out by the approved Clydeplan Strategic Development Plan (SDP) and Scottish Government.</p> <p>Kirkintilloch lies within the Strathkelvin and Greater Glasgow North East Housing Sub-Market Area as part of the Kirkintilloch and Twechar Local Authority Sub-Area. The housing supply target and housing land requirement of the Strathkelvin and Greater Glasgow North East Housing Sub-Market Area requires to be addressed as part of the Proposed Local Development Plan (LDP) 2.</p> <p>The latest 2016-based Principle Household Projections illustrate that household growth across East Dunbartonshire from 2016 to 2032 is projected to be an estimated 4,181 new homes. Taking account of the existing need of circa 900 homes this equates to housing need and demand / housing supply target of 5,081 homes. This matter is discussed in detail in response to Issue 34: Housing Land Requirement. Only one of the Preferred Option sites identified in the MIR is identified as a Preferred Option Site Allocation within the Monitoring Statement. This site at Merkland School (ref: 326) is only identified as having a capacity of 40 units. There is a strong demand for new private and affordable housing in the area, which will not be met by</p>	

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

the Council's proposed additional 40 units. The Council is required to consider the release of additional housing sites within the Proposed LDP2 to meet the established demand.

It is noted that the Main Issues Report (MIR) Preferred Option identifies further housing sites ('Preferred Housing Sites Subject to Further Assessment'). The Monitoring Statement states that the other sites identified as part of the MIR's Preferred Option are ...not part of the SEA preferred option. These sites ...have constraints which require further investigation to determine if they can be avoided or mitigated, for example environmental constraints and amenity considerations. The Monitoring Statement confirms that it is ...possible that these sites may not be included within the Proposed Plan. It is therefore plausible that the Proposed LDP2 will only allocate 40 units for residential development within Kirkintilloch.

Of the additional 'Preferred Housing Sites Subject to Further Assessment' only one (ref: S353) is identified within the Waterside area. This site is identified as having an indicative capacity of 12 units. There is a strong demand for new private and affordable housing in the area, which will not be met by the Council's proposed 12 additional units. As noted above, the site requires further assessment to determine the extent of flood risk on site. The Proposed Plan may therefore identify no suitable sites for residential development within the Waterside area if the Preferred Option is not progressed.

The reliance of the MIR on sites which do not form part of the SEA preferred option, nor have been subject of suitable assessment, is not supported. The Council should be identifying sites that are free from technical constraints and able to make a contribution towards the provision of a generous housing land supply over the 10 year period to 2032. If following further assessment, it is identified that these additional sites are not suitable for development, the Council is required to allocate additional sites that are capable of delivering residential development.

For the following reasons, the Council has an opportunity to reconsider the proposed development at Monastery Field, Waterside (Ref: S208). A Development Framework Report, Site Effectiveness Statement and Site Assessment Review have been prepared and support this representation to the MIR. The evidence presented in the Development Framework Report supports the sites allocation in the Proposed LDP2 for the following reasons:

- The proposal is in a sustainable location with an easy walk to bus services as well as local services and amenities.
- The allocation of this site will be in keeping with the character of the surrounding urban and local landscape context.
- The site can be removed from the Green Belt without compromising Green Belt objectives.
- The Site Effectiveness Statement confirms that the site is effective and can deliver housing completions within the first five year period of the LDP.

The Site Assessment Review confirms that the Council's Site Selection Methodology for identifying preferred and alternative sites for housing in the MIR requires further clarification. It is recommended that all sites submitted in preparation of the Proposed LDP 2 should be reassessed in order to provide a generous housing land supply over the 10 year period to 2032.

In relation to Monastery Field, Waterside (ref: S208), the Specialist Appraisal and SEA Assessments have been updated as part of the Site Assessment Review in order to assist the Council in its reassessment to identify additional housing sites as part of the Proposed LDP 2. The Revised Specialist Appraisal (Appendix 1)

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

highlights that there are no significant constraints to the development of the site. The site is effective and will be delivered within the period of the Proposed LDP 2. The Updated SEA Assessment (Appendix 2) demonstrates that the site should score more positively than the Council's own assessment. Accordingly, there are no planning or environmental reasons why Monastery Field, Waterside (Ref: S208) should not be allocated for housing in the Proposed LDP 2.

Geddes Consulting for Taylor Wimpey (S345) - The development strategy for the East Dunbartonshire local authority area requires modification to meet the growth estimates set out by the approved Clydeplan Strategic Development Plan (SDP) and Scottish Government.

Kirkintilloch lies within the Strathkelvin and Greater Glasgow North East Housing Sub-Market Area as part of the Kirkintilloch and Twechar Local Authority Sub-Area. The housing supply target and housing land requirement of the Strathkelvin and Greater Glasgow North East Housing Sub-Market Area requires to be addressed as part of the Proposed Local Development Plan (LDP) 2.

The latest 2016-based Principle Household Projections illustrate that household growth across East Dunbartonshire from 2016 to 2032 is projected to be an estimated 4,181 new homes. Taking account of the existing need of circa 900 homes this equates to housing need and demand / housing supply target of 5,081 homes. This matter is discussed in detail in response to Issue 34: Housing Land Requirement. Only one of the Preferred Option sites identified in the MIR is identified as a Preferred Option Site Allocation within the Monitoring Statement. This site at Merkland School (ref: 326) is only identified as having a capacity of 40 units. There is a strong demand for new private and affordable housing in the area, which will not be met by the Council's proposed additional 40 units. The Council is required to consider the release of additional housing sites within the Proposed LDP2 to meet the established demand.

It is noted that the Main Issues Report (MIR) Preferred Option identifies further housing sites ('Preferred Housing Sites Subject to Further Assessment'). The Monitoring Statement states that the other sites identified as part of the MIR's Preferred Option are ...not part of the SEA preferred option. These sites ...have constraints which require further investigation to determine if they can be avoided or mitigated, for example environmental constraints and amenity considerations. The Monitoring Statement confirms that it is ...possible that these sites may not be included within the Proposed Plan. It is therefore plausible that the Proposed LDP2 will only allocate 40 units for residential development within Kirkintilloch.

Of the additional 'Preferred Housing Sites Subject to Further Assessment' only one (ref: S353) is identified within the Waterside area. This site is identified as having an indicative capacity of 12 units. There is a strong demand for new private and affordable housing in the area, which will not be met by the Council's proposed 12 additional units. As noted above, the site requires further assessment to determine the extent of flood risk on site. The Proposed Plan may therefore identify no suitable sites for residential development within the Waterside area if the Preferred Housing Sites Subject to Further Assessment is not progressed.

The reliance of the MIR on sites that do not form part of the SEA preferred option, nor have been subject of suitable assessment, is not supported. The Council should be identifying sites that are free from technical constraints and able to make a contribution towards the provision of a generous housing land supply over the 10 year period to 2032.

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

If following further assessment, it is identified that these additional sites are not suitable for development, the Council is required to allocate additional sites that are capable of delivering residential development. For the following reasons, the Council has an opportunity to reconsider the proposed development at Waterside Road / Gartshore Road, Kirkintilloch (Ref: S345). A Development Framework Report, Site Effectiveness Statement and Site Assessment Review have been prepared and support this representation to the MIR. The evidence presented in the Development Framework Report supports the site's allocation in the Proposed LDP2 for the following reasons:

- The site is in a sustainable location with an easy walk to bus services as well as local services and amenities.
- The allocation of this site will be in keeping with the character of the surrounding urban and local landscape context.
- The site can be removed from the Green Belt without comprising Green Belt objectives.
- The site will form a successful infill development and present a logical extension to the settlement.
- The Site Effectiveness Statement confirms that the site is effective and can deliver housing completions within the first five year period of the LDP.
-

The Site Assessment Review confirms that the Council's Site Selection Methodology for identifying preferred and alternative sites for housing in the MIR requires further clarification. It is recommended that all sites submitted in preparation of the Proposed LDP 2 should be reassessed in order to provide a generous housing land supply over the 10 year period to 2032.

In relation to Waterside Road / Gartshore Road (Ref: S345), the Specialist Appraisal and SEA Assessments have been updated as part of the Site Assessment Review in order to assist the Council in its reassessment to identify additional housing sites as part of the Proposed LDP 2.

The Revised Specialist Appraisal (Appendix 1) highlights that there are no significant constraints to the development of the site. The site is effective and will be delivered within the period of the Proposed LDP 2. The Updated SEA Assessment (Appendix 2) demonstrates that the site should score more positively than the Council's own assessment.

Accordingly, there are no planning or environmental reasons why Waterside Road / Gartshore Road (Ref: S345) should not be allocated for housing in the Proposed LDP 2.

S353 Moss Road

Waterside Community Council - One site proposed for social housing in the Main Issues Report is the site of the garages at the bottom of Moss Road, Waterside. While Waterside Community Council approves the idea in principle of increasing the availability of social housing, it is clear that taking away five well-used garages would mean more cars being obliged to park on Moss Road, a street that is already very congested as it is, with vehicles currently forced to weave in and out of parked cars on either side of this narrow road. And that is without considering the extra traffic that would be associated with 12 more homes. We are aware that there have already been a number of near traffic accidents at the junction with Berryknowe/Alexander Place. This is something that also suggests to us that siting additional housing on Moss Road (and thereby adding to the traffic) would not be desirable. Please note also that Moss Road is the main access route to the school path for children walking to Gartconner Primary School from Waterside – extra traffic on Moss Road would

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

mean their being exposed to more traffic pollution and to more traffic risks, which is clearly undesirable. More housing would of course also mean more vehicles using Bankhead Road – the only route into and out of Waterside – at rush hour. This is a time when traffic is already heavy (a situation that is likely to worsen if the proposed ASN school on Waterside playing field goes ahead). Bankhead Road is already heavily used by cars, buses, coaches (Waterside has three coach companies operating from the village), trucks and delivery vans. We should point out that the area at the bottom of Moss Road has significant flooding issues (because of the presence of Moss Goat burn and the moss), and the ground there is usually saturated.

Deborah Carmichael - One site proposed for social housing in the Main Issues Report is the site of the garages at the bottom of Moss Road (S353), Waterside. While I am aware of the need for social housing, it is clear that taking away five well-used garages would mean more cars being obliged to park on Moss Road, a street that is very congested as it is, with vehicles currently forced to weave in and out of parked cars on either side of a narrow road. And that is without considering the extra traffic that would be associated with 12 more homes. There have also been a few near misses at the junction with Berryknowe/Alexander Place, which again suggests to me that siting additional housing in Moss Road (and thereby adding to the traffic) would not be desirable. Please note also that Moss Road is the main access route to the school path for children walking to Gartconner Primary School from Waterside – an additional reason that having extra traffic on Moss Road is undesirable. New housing would mean more vehicles using Bankhead Road at rush hour a situation that is likely to worsen if the proposed ASN school on Waterside playing fields goes ahead. I should point out that the area at the bottom of Moss Road has significant flooding issues because Moss Goat burn which was diverted into a pipe decades ago is no longer maintained and the ground therefore is usually saturated in any season.

Scottish Water - Scottish Water welcomes early engagement and we recommend that the Developers submit a Pre Development Enquiry (PDE) Form which can be found on our website (www.scottishwater.co.uk) and is free to submit to our Development Operations Team. The completed PDE will allow us to conduct a tailored assessment of the development and to ascertain what (if any) impact the developments have on the local network.

SEPA - support the focus in the Preferred Option on brownfield and vacant land.

SPT – Agree with the preferred option. These site make best use of existing and future brownfield land in the area. Further work will be required where sites are not currently well served by public transport or where a site is remote from local services to reduce the potential for private vehicle travel. This in particularly an issue for sites at Kirkintilloch Gateway.

SNH - As regards the sites allocated from the preferred housing package, we offer the following comments:

- S24 - Kirkintilloch Gateway: A Development Brief should be produced/be required with sites S100, S346 and S347.
- S100 - Kirkintilloch Gateway: A Development Brief should be produced/be required with sites S24, S347 and S346.
- S346 - Kirkintilloch Gateway: A Development Brief should be produced/be required with sites S24, S100 and S347.

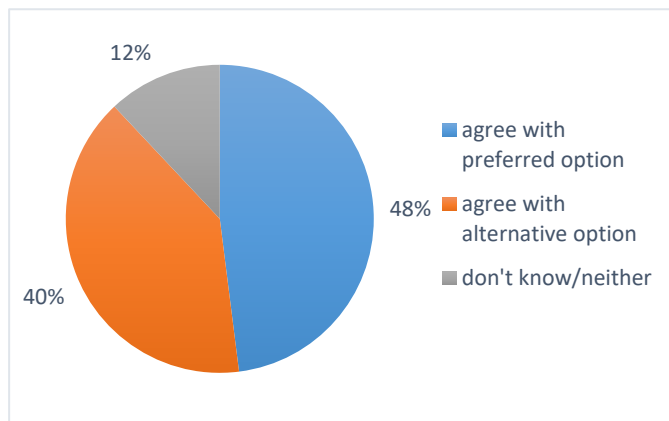
Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside
-----------------------------	-------------------------------------

- S347- Kirkintilloch Gateway - A Development Brief should be produced/be required with sites S24, S100 and S346.
- S365 - Langmuir Road, Kirkintilloch: This is a small site located on the Eastern gateway to Kirkintilloch. We recommend that the existing trees and hedgerows be retained and strengthened to enhance the sense of place and create a robust landscape framework for housing. We further recommend that a robust planted edge be created to the main road and suggest a minimum 20m strip; e.g. double avenue standard trees with understorey / hedge. These should be included as site requirements.
- S366 Campsie View School, Lenzie: This is a small site. We recommend that the existing trees and hedgerows be retained and strengthened to enhance the sense of place and create a robust landscape framework for housing. These should be included as site requirements.

See also our comments relative to sites under Issue 16.

Issue 18 - Should the LDP continue to safeguard land at Woodilee for a potential new rail halt?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Remove land safeguarding for new rail halt at Woodilee and focus on alternative public transport improvements	2. Retain land safeguarding and designation for rail halt at Woodilee



Agree with preferred option – 12
 Agree with alternative option – 10
 Other / Don't Know – 3

Summary of comments from individuals

Mixed comments were received on this option with some stating that a new station at Woodilee is needed and would help reduce car usage and that Lenzie station and limited parking is insufficient to support

Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside
------------------------------------	--

demand. One comment suggested this provides a good opportunity to build a park and ride away from residents. Other comments however stated that a station at Woodilee is impractical due to the proximity of Lenzie station and that public transport between Lenzie station and Woodilee would be a more sustainable option.

Summary of responses from groups and organisations:

SPT – Agree with the preferred option. This reflects the LTS and the land remains protected from development through the open space designation so as not to preclude the option in the long term.

Network Rail – Agree with the preferred option. Network Rail would support the preferred option to remove the land safeguarding and focus on alternative public transport improvements. The proposed location identified in the adopted LDP is only 1.4 km from Lenzie Station and may raise issues in terms of achieving appropriate line speed between stations and impacts on existing and future timetabling on the key Edinburgh to Glasgow route.

Geddes Consulting (Langmuir & Bankhead Rd/ Monastery Field & Waterside Road/ Gartshore Rd) – The Preferred Option is in accord with the Local Transport Strategy.

Profilli Partnership for AE Holdings (Waterside) Limited (Waterside Bing) - Support MIR Alternative Option 2. There are advantages to both options, although it is noted that removing the designation of the rail halt will not alter or affect the status of the land as open space and greenbelt and as such could be re-visited at an appropriate time in the future. However the Main Issues Report refers to the importance of sustainable transport and mitigating against the risk of climate change which requires the delivery of proposals like Woodilee rail halt. Retaining the potential rail halt proposal in the Local Development Plan supports the position that it is a proposal that could come forward in the short or long-term especially if government funding or funding from other sources had to become available. It is an appropriate location given the recent and ongoing house building at Woodilee/Fauldhead and nearby communities of Kirkintilloch and Waterside. Furthermore a new rail halt brings with it park and ride facilities and feeder bus services to it which have the potential to support the local bus service in general and overall support growth in public transport use.

SEPA - It is not quite clear as to why it is proposed to remove safeguarding of the land here for a potential new rail halt. As we understand it, the new East Dunbartonshire Local Transport Strategy covers the period 2020 to 2025, which is very short term in the context of safeguarding potential rail halt sites. We would suggest it would be prudent to remove the safeguarding only if it is certain that the need for a new rail halt will not materialise.

Issue 19 - How can the LDP support and promote the local visitor economy in Kirkintilloch, Lenzie and Waterside?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Provide criteria to encourage appropriate new visitor economy or tourism development, with specific focus on 'Tourism Asset Areas'.	2. Provide criteria to encourage appropriate new visitor economy or tourism development without specifying locations (Tourism Asset Area approach)

Community Area/Policy
Theme

Kirkintilloch, Lenzie and Waterside

Summary of comments from individuals:

- One respondent suggested that the preferred should specify that consideration will only be given to proposals a set distance away from the identified assets (e.g. 1km)
- Kirkintilloch town centre should continue to improve and should encourage visitors (e.g. by removing parking charges)
- Council should support the award winning 'Giant phone box' design idea.
- Create nature walks and protect green space.

Summary of responses from groups and organisations:

Kirkintilloch CC - A successful town will be in part delivered by making the most of the wide ranging assets that Kirkintilloch has available but currently some of which are underutilised. A new heritage strategy should be developed to promote and grow Kirkintilloch's offerings along the lines of:

- Whisky industry/heritage
- Roman history/heritage
- Industrial past
- Canal town – including better use of the canal

The delivery of this, and growing the number of visitors to the town would grow the local economy, increase civic pride and help ensure people had enhanced health and wellbeing. In addition better walking/cycling linkages between these offerings should be developed, plus better linkage/use of the Marina should also form part of this strategy.

Geddes Consulting (Langmuir & Bankhead Rd/ Monastery Field & Waterside Road/ Gartshore Rd) – The Preferred Option is in accord with the Economic Development Strategy.

Profilli Partnership for AE Holdings (Waterside) Limited (Waterside Bing) - Support MIR Preferred Option 1. Possible Tourism Asset Areas Listed should also include Waterside. LDP 2 should identify and encourage with the assistance of the local community the Tourism Asset Area for Waterside. It should be noted that the proposed removal and remediation of the Waterside Bing Site provides an opportunity to encourage visitors and improve the visitor experience to Waterside, for example removing and remediating the bing will provide opportunities for creating new pathways within and around the site although mindful of protecting habitats, these new pathways can link into the wider Green Network. The landowner is keen to encourage community involvement in exploring what investment could come to the local community via remediation of the bing such as improvements to the public and private road leading to the bing site, educational boards and signage about the habitats within the two LNCS and the former use of the site as part of the Wester Gartshore Colliery.

Historic Scotland - We are content with the preferred option which suggests providing criteria to encourage appropriate new development with focus on Tourism Asset Areas (TAA). We note that for these areas the Antonine Wall is being considered as a TAA and as such consultation with HES regarding the proposed criteria will be required. We would also note that any such criteria will need to accord with the Antonine Wall Management Plan and the Supplementary Planning Guidance for the Antonine Wall. The Forth & Clyde Canal is also being considered as a TAA and again HES should be consulted regarding the criteria being proposed.

Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside
<p>We note that the category A listed Auld Kirk Museum is a further TAA being considered. Increased tourism could potentially be beneficial to this asset provided that proposals do not require substantial alterations which affect its fabric or character. The criteria should ensure that no significant adverse impacts to the site or setting of any of these assets are proposed by developments.</p> <p>SPT – Agree with the preferred option. This encourages best use of the areas assets while seeking to manage and direct demand.</p> <p>SNH - We support the principle of this approach. It will be important to ensure that criteria to promote the tourism/visitor economy, with specific focus on ‘Tourism Asset Areas’ provides for their understanding, protection and enhancement.</p>	
Planning Authority response	
<p>The Proposed Plan has been prepared taking into account the responses received on the following issues.</p> <p>Issue 14 - What is the most appropriate way to ensure proposals for land use change or development in Hillhead and Harestaness reflect the priorities identified in the Hillhead and Harestaness Place Plan?</p> <p>The Hillhead and Harestaness Place Plan covers the period 2018 to 2023 and was reported to the Community Planning Partnership in 2018 after public consultation. The Place Plan is a Locality Plan, produced under the Community Empowerment (Scotland) Act 2015. Scottish Planning Policy section on outcomes identifies that “At the strategic and local level, planning can make a very important contribution to the delivery of Single Outcome Agreements, through their shared focus on ‘place’. Effective integration between land use planning and community planning is crucial and development plans should reflect close working with Community Planning Partnerships”. Only Place Plan priorities which relate to land use change will be identified in the Plan. Relevant priorities in future Place Plans will be considered during the next review of the Local Development Plan.</p> <p><i>Conclusion: Implement preferred option</i></p> <p>Issue 15 - How should the Kirkintilloch Town Centre Masterplan be reviewed and refreshed to update the long-term strategy for the Town Centre?</p> <p>Once the Masterplan has been fully implemented, the Council will embark on a new long-term strategy for the town centre, in line with the approach taken for Bearsden, Bishopbriggs and Milngavie town centres, all of which currently have strategies in place. It is fully anticipated that this will be a collaborative process, with community groups and organisations playing a central role in any future strategy. For example, it is noted that the ‘Your Kirky’ community led group has already carried out a significant amount of research relating to the town centre priorities, and have expressed a willingness to take forward certain projects. This is fully supported and encouraged by the Council, and will be reflected in LDP 2 through the preferred option approach.</p> <p><i>Conclusion: Implement preferred option</i></p> <p>Issue 16 - Should the LDP revisit vacant and derelict business land in Kirkintilloch and potentially re-allocate for alternative uses?</p>	

Community Area/Policy Theme

Kirkintilloch, Lenzie and Waterside

More than three quarters of individual respondents agreed with the preferred option (re-evaluating vacant and derelict business land for potential alternative uses), with nearly all of the rest agreeing with the alternative option (retaining business and employment designations of vacant and derelict sites) and only one response agreeing with neither option. Comments were supportive of bringing sites back into use in general, with alternative uses deemed preferable to continued vacancy. Some respondents also mentioned that they would rather see housing built on these sites if it is an alternative to building on green land. A few comments emphasised that sites should be assessed to ensure that they are not attractive to businesses before permitting alternative uses. One response suggested that a tourist attraction – ‘Kirky’s Giant Phone Box’ – could be a suitable alternative use for brownfield land. It was also noted that commuting has negative impacts on the local economy and on environmental sustainability, and so there is a need to ensure that there are still accessible business sites in Kirkintilloch. The majority of responses on behalf of businesses or organisations were supportive of the preferred option in principle, but with some house-builders and landowners feeling that the description of suitable alternative uses for the sites in which they have specific interest do not go far enough – they would prefer to see these sites fully deallocated from business and employment use in line with their aspirations for housing or retail development. One business was in full support of the alternative option, noting concerns about development constraints on some of the sites, as well as the need to maintain a business and employment land supply. Two key agencies – NHS Greater Glasgow and Clyde and Scottish Water, did not take a particular view on the issue but emphasised that any development on the sites must take into account the capacity of local healthcare provision and water supply respectively. SEPA and SPT were supportive of the preferred option, although SPT noted that applications for alternative uses should consider site accessibility. SNH was also supportive of the preferred option, but with the caveat that Woodilee Industrial Estate/ Kirkintilloch Gateway should produce a development brief and that all proposals for alternative uses on vacant and derelict land should consider the impacts of development on biodiversity. The Council maintains that it is important for local economic growth that marketable sites are retained for future business and employment, but also acknowledges the value to communities of bringing vacant and derelict sites into productive use. The Council aims to work with the landowners and agents of the vacant and derelict business and employment sites identified under this issue to achieve development for suitable uses as described in the Main Issues Report. The Council is also in the process of producing a Business Land Requirement Report, which will give an updated analysis of East Dunbartonshire’s business and employment land supply and requirements.

Conclusion: Implement preferred option

Issue 17 - Where should new housing in Kirkintilloch, Lenzie and Waterside be located?

A large number of comments from local residents were received expressing strong support for the preferred option. There was also support from SEPA and SPT, particularly in terms of focusing on brownfield development as a priority. The Council also received responses from various site promoters, all of whom disagreed with the preferred and alternative options. These submissions focused on reasons as to why their particular site should be allocated for development in LDP 2. Please note that any new information that was provided for each site has been incorporated in to the updated site assessments (separate document). Overall, the Council does not agree that there is sufficient rationale to deviate from the preferred option.

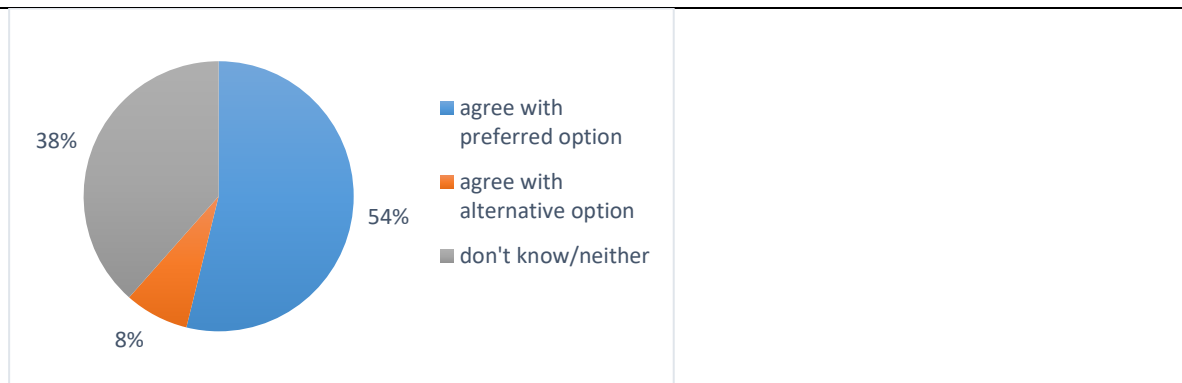
Conclusion: Implement preferred option

Issue 18 - Should the LDP continue to safeguard land at Woodilee for a potential new rail halt?

Community Area/Policy Theme	Kirkintilloch, Lenzie and Waterside
<p>The majority of comments received supported this option including from SPT and Network Rail. The option of removing safeguarding was considered through the process of developing a new Local Transport Strategy for East Dunbartonshire and the full rationale is detailed within the Transport Options Report.</p> <p><i>Conclusion: Implement preferred option</i></p> <p>Issue 19 - How can the LDP support and promote the local visitor economy in Kirkintilloch, Lenzie and Waterside?</p> <p>The preferred option was largely endorsed, including support from the local community and key agencies (including Historic Scotland, SPT and SNH). The Council will consider relevant suggestions as part of the drafting of this policy, including alignment with the Antonine Wall Management Plan.</p> <p><i>Conclusion: Implement preferred option</i></p> <p>The Proposed Plan is subject to consultation, with all representations being considered by a Reporter on behalf of Scottish Ministers. This provides a final opportunity for comments.</p>	

Lennoxtown, Milton of Campsie, Haughhead and Clachan of Campsie

Community Area/Policy Theme	Lennoxtown, Milton of Campsie, Haughhead and Clachan of Campsie	
Elements of the engagement included:	<ul style="list-style-type: none"> • Questionnaire • Drop In Session • Hard copy paper responses • Email Responses • Questionnaire Comments 	
List of Organisation(s) commenting on this topic		
<ul style="list-style-type: none"> • Barton Willmore, for Bellway Homes • Historic Scotland • Keppie, for Ashfield Land • Milton of Campsie Community Council • Milton of Campsie Greenbelt Preservation Group. • Montagu Evans, for Caledonian Properties Ltd • NHS Greater Glasgow & Clyde (NHSGGC) • North Planning & Development, for Taylor Wimpey • Persimmon Homes • Scottish Environment Protection Agency (SEPA) • Scottish Natural Heritage (SNH) • Scottish Water • Strathclyde Partnership for Transport (SPT) • Woodland Trust Scotland 		
Planning authority's summary of the representation(s):		
<p><u>Issue 20 - What is the most appropriate way to ensure proposals for land use change or development in Lennoxtown reflect the priorities identified in the Lennoxtown Place Plan?</u></p>		
<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>	
1. Include the Place Plan priorities relevant to development and land use change in LDP2.	2. Cross refer to the Place Plan on a case by case basis at planning application stage	



Agree with preferred option – 14
 Agree with alternative option – 2
 Other / Don't Know – 10

Summary of Comments from individuals:

The options offered are not helpful, they are both too vague to give informed support. I want to prioritise keeping community identities, and a strong community that can function with purpose. Green belt protection is very important.

The questionnaire comments from individuals on issue 20 mainly relate to individual site suggestions and have been included in the summaries for Issue 21.

Summary of responses from groups and organisations:

Barton Willmore, for Bellway Homes - MIR Preferred Option – Does not agree. Bellway are of the view that EDC need to be extremely careful in terms of how they incorporate Place Plans into the development plan. The development plan is well consulted across a wide spectrum of users and creators of space, from the community and stakeholders to developers and commercial companies. Place Plans do not receive the same scrutiny and as such are not as soundly prepared. Whilst we recognise that place plans represent the ‘will’ of local people, they are less likely to have a commercial understanding of issues and as such are not always considered as realistic or deliverable. In this regard, we are of the view that option 2 should be the preferred option, where place plans can be viewed as a material consideration on a site by site basis, rather than being incorporated as a formal part of the development plan.

North Planning & Development, for Taylor Wimpey – Do not agree with the preferred option. Taylor Wimpey are supportive of the ‘Reasonable Alternative Option’, set out at page 63 of the MIR, which establishes that whilst the Place Plan would not form part of the new LDP, wording would be included that cross-refers readers to it as supporting guidance. This option would require relevant proposals to consider the Place Plan, and the Place Plan would remain as non-statutory guidance.

This is considered the most reasonable and proportionate approach and will ensure that the application of the Place Plan against individual planning applications is considered in light of the tests set out in Circular 3/2012 (Planning Obligations and Good Neighbour Agreements).

Taylor Wimpey are supportive of Place Plans and recognise that housing development can potentially assist in the delivery of the projects identified therein. The MIR identifies a series of projects within Lennoxton, including Main Street Improvements and open space enhancements. Taylor Wimpey are committed to the delivery of new housing development at Lennoxton and through that there is potential scope to contribute towards Place Plan projects.

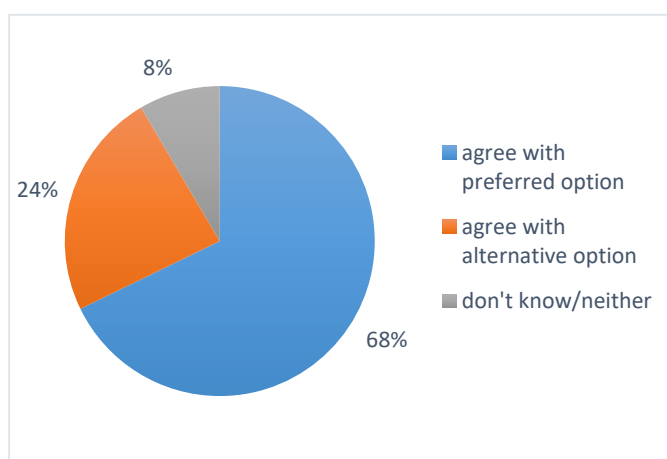
Persimmon Homes - The incorporation of Place Plans in LDPs has the potential to make LDPs larger and more unwieldy as new Place Plans emerge over time and form new layers of LDP information. Additionally, local communities may not have the resources to review Place Plans every 5 years or alongside the LDP cycle whilst it will become confusing for the local community as to what they are engaging with. Place Plans should be material considerations referred to within and read alongside the LDP. It may be that some of the Place Plan priorities mirror that of the LDP. If the Place Plan was a material consideration it will allow professional officers to attribute appropriate weight to the Place Plan when an application is being determined.

Research compiled by Pinsent Mason, Appendix 1, highlights that Place Plans may not be truly representative of the local “communities” views. It demonstrates that whilst circa 90% of people voting on a Neighbourhood Plan in England support the plan only around 25-30% of the “community” turnout to vote. Better engagement in the actual LDP process will prevent the creation of Local Place Plans which are potentially not representative of the local view of how an area should be developed.

SPT – Agree with the preferred option. To not include the place plan priorities within LDP2 would lessen their status.

Issue 21 - Where should new housing in Lennoxton, Milton of Campsie, Haughhead and Clachan of Campsie be located?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
<p>1. Allocate the sites from the preferred housing package (see Issue 34) located within Lennoxton, Milton of Campsie, Haughhead and Clachan of Campsie in addition to the sites within the current LDP and/or with planning consent:</p> <ul style="list-style-type: none"> • S321 St Machan’s Way, Lennoxton (100% affordable housing). 	<p>2. Allocate the following sites from the alternative housing package (see Issue 34) in addition to the preferred option:</p> <ul style="list-style-type: none"> • S322 Derrywood Road, Milton of Campsie (100% affordable housing). 40 homes.



Agree with preferred option – 40
 Agree with alternative option – 14
 Other / Don’t Know – 5

Summary of comments from individuals:

Preferred Option - S321 St Machan's Way

- Support option for development of affordable housing at S321 St Machan's Way, within walking distance to public transport. Support provision of affordable housing.
- Support the Council view that greenbelt at Redmoss Farm, Milton of Campsie is unsuitable for development and object to proposals for building there. Would like to protect Redmoss Farm's value as a Local Nature Conservation Site in good condition, including local biodiversity action plan priority habitats, wider ecology. It also defines the rural setting of the village and is green network used for recreation. Do not want the impact of additional vehicular traffic on already congested roads, particularly when there is poor access to public transport. This would have adverse effects in relation to air quality and greenhouse gas emissions. Increased housing has already compounded traffic problems on Birdston Road; of speeding, road safety, overgrown hedges obscuring signs and narrowing pavements, poor road state; therefore the road infrastructure cannot accommodate more traffic. The proposed access at Marley Way is unsuitable and would need footpath removal and compulsory purchase of gardens.
- Redmoss land should be for wildlife and tree planting to add to recreational use for residents.
- Support the Council view that greenbelt at West Birdston, Milton of Campsie is unsuitable for development and object to proposals for building there. Would like to protect the green network and open space of the community woodland at West Birdston. Increased traffic will put an even greater burden on the existing road network and affect air quality.
- Understand the need for additional housing, particularly affordable housing or housing for the elderly. Full use of more suitable sites has to be made.
- Milton of Campsie has done enough in the last few years to address the housing shortage, and is in danger of losing its village identity. Would like the character of the village protected by retaining the greenbelt.
- In general support all of the technical reasons provided in the Environmental Assessment pages of the Main Issues Report.
- Milton of Campsie cannot support more housing as the school needs upgraded, there is no doctors' surgery or health clinic and little services and facilities for the elderly and the young.
- Provision of two affordable houses is not a strategy.

Alternative Option – Site S322 Derrywood Road, Milton of Campsie

Object to proposed house building at Derrywood and do not support it as an alternative site because:

- In comparison with other areas Milton of Campsie has had additional housing: social housing as well as the Fin Glen development still to be completed.
- Concerned about the development due to poor access to public transport and impact on parking, traffic congestion and air quality, in particular near Craighead School. Milton of Campsie has high car ownership. Narrow steep roads would be used to access the site including Scott Avenue, which has parking problems and road safety issues as a result. School lane is a single track road and is not capable of meeting the current demands, and will not cope with an influx of traffic from this site.
- There is poor access to public transport in Milton of Campsie
- Concerned about the development of this green belt site on green field land, would like the character and hill setting of the village protected by retaining the greenbelt. Accessible greenbelt is well used by residents and improves people's wellbeing.
- The biodiversity value of the site, including to scrub habitat, and opportunity for woodland planting would be lost. Semi natural habitat benefits people.
- is a very tight area next to a school
- Milton of Campsie does not have the space or facilities to support more housing. Lennoxton does and has much more in the way of facilities compared to Milton of Campsie.

Supportive Comments - Land in St Machans Way is minimal. Derrywood Road plan is a much better use of the land available. At least Derrywood Road site is all to be affordable. Support the site being identified as a not suitable alternative site.

Other General Comments:

- Do not support either option, do not want any more houses in green belt, with its biodiversity and recreational value. Do not want more housing development due to impact of traffic on congested roads.
- Support the non allocation of the extended area proposed by developers for building on land east of site 6.58 Lennoxlea and would prefer to see this allocated site excluded from the Plan. It would lead to coalescence of the villages, put further strain on limited local infrastructure and be unsustainable by increasing dependence on car use.
- Would like more transparency in planning decisions.
- Planning adverts in local paper are not enough publicity as many people do not read it.
- Concerned about road safety of repositioning the bus stop outside the Birdston Hospital, as part of the new housing development at Birdston.
- The Local Development Plan 2 Main Issues Report is comprehensive and clear and consultation has been organised in an open way.
- Documents of over 800 pages do not seem very accessible for the most of the population.
- Traffic on Birdston Road is too fast and it needs road speed bumps at strategic points to quieten traffic going through the village.
- Lennoxton has seen much housing development in the past decade and this has not improved the look of the village and has not brought business to shops. Therefore must protect the village from future housing development especially when this is going to be in green/ wooded areas. e.g. Benview Woodland also known as Redhills wood.
- I favour brown site development, and I think if we are part of the Clyde Valley and Glasgow we need to make sure that there is attractive development in the bigger towns. Many people like to live in towns, there is no shortage of people wanting to live in the nice areas of Glasgow, new developments in decaying centres need to be attractive.
- Question is not clear, but prefers no building on green belt.
- New housing in Lennoxton should reflect that it is a village, 4 storey flats like the ones on the Main St are not in-keeping with the area.
- The environment and woodlands should be protected from new housing.
- The transport system in the village is unable to cope with more housing.
- LDP 6.58 Lennox Lea - The junction at this site is dangerous, the key requirements for the site must address this.

Summary of responses from groups and organisations:

Note: New or updated information received from developers and key agencies on individual sites has been incorporated into the relevant site assessment, which have been updated separately.

Barton Willmore, for Bellway Homes (Site S18 Redmoss Farm): MIR Preferred Option – Does not agree
This representation document has been prepared by Barton Willmore on behalf of Bellway Homes in relation to their site at Redmoss Farm on the edge of Milton of Campsie.

We have reiterated some of the key points set out both at the Call for Sites Stage and also within representations submitted to LDP1 where part of the site was put forward by EDC as an allocated site, only to be removed by the reporter on the basis of a lack of information on ecology and protected species.

It was recognised at that stage that the site was viewed as a suitable and logical site for the appropriate urban expansion of Milton of Campsie. A number of positive comments from the reporter have been set out within this document.

Notwithstanding the suitability and deliverability of the site, it has not been accepted as a future housing site within the preferred strategy of EDC for the future of housing delivery in the life of LDP2. The site at Redmoss Farm offers an excellent opportunity for the delivery of a mix of affordable homes to address a need in this part of East Dunbartonshire.

Bellway own an area of c.38.6ha of land to the west of Milton of Campsie. They are seeking to promote two parts of this wider area for housing development, creating two separate sites (Site 1 - 7.25ha and Site 2 – 2.4ha) that adjoin the existing urban area of Milton of Campsie. The vision for the site is:

- Bellway Homes are promoting the use of 25% of their site at Redmoss Farm, in Milton of Campsie for the development of a maximum of 300 homes, all of which can be made available for much needed affordable housing in this part of East Dunbartonshire.
- The site offers a sustainable opportunity for the appropriate and logical expansion of the settlement, whilst respecting and enhancing the features associated with the Local Nature Conservation Site that covers much of the site.
- The opportunity exists to provide a mix of high quality affordable homes of varying sizes that meet the varying needs of the community in and around Milton of Campsie and East Dunbartonshire, in keeping with the aims and objectives of the Local Development Plan and the Strategic Housing Investment Plan.
- New Housing should be located where it is desired, and where it is needed. The proposal to allocate land at Redmoss Farm for 100% affordable housing meets both of those requirements and should be accepted within the emerging Local Development Plan.

The representation refers briefly to the information provided as part of the consultation on the current LDP and LDP2 early engagement stage and presents some of the information. In addition, the document seeks to respond to the site assessment that has been carried out by East Dunbartonshire Council (EDC) following the Call for Sites stage of the LDP2 preparation.

Keppie for Ashfield Land (Site S205 West Birdston) – do not agree with the Preferred Option. Rather, additional land should be allocated in Milton of Campsie, as the only proposed additional sites in the wider area are just 2 affordable housing units in Lennoxton. Rather, additional land should be allocated in Milton of Campsie, specifically at the West Birdston site, to provide a more generous supply with a range of type and tenure.

The owner is already in discussion with a number of housebuilding partners who are interested in the development of the site at West Birdston. The success and sale progress of the adjacent Birdston Road site demonstrates that the market and affordable housing in this area is in demand.

This representation has sought to answer the key questions in relation to our client's interests at West Birdston, namely Issues 21 and 34, with a commendation that the land at West Birdston is added to the list of preferred residential releases. It provides further site specific information for the proposal and comments on the content of the site assessment.

As outlined in this representation, we have evaluated the site against the Assessment Methodology and Site Evaluation Criteria provided and have suggested a different score for the site to that offered by the Council. The site scores higher than the sites proposed for release through the MIR for various reasons, including:

- It is well located to the existing settlement
- It is in a highly sustainable and accessible location, in proximity to key local facilities and services, and the public transport network;
- The site is effective, is clearly attractive to housebuilders and, with no notable constraints to development, can deliver housing development in the short to medium term, commencing within the LDP2 period;
- It does not fall within any local or national protected sites relating to the environment or ecology, nor does it adversely affect any nearby built heritage assets. It should be noted that site now also includes the adjacent land which can be made available for recreational opportunities.

The site's release will assist in providing a range and choice of location for new housing in terms of size and location across Milton of Campsie and associated villages and will provide further flexibility and generosity to the housing land supply. It is considered that such an approach is preferable to a reliance on very few small windfall developments.

Given all of the above, and that contained within this Representation, we commend this proposed release to East Dunbartonshire Council, for development commencing within the period of the emerging Local Development Plan 2.

Milton of Campsie Community Council - MIR Preferred Option: Milton of Campsie has recently seen the completion of a number of developments which have seen the construction of approximately 65 affordable homes to meet the local need. The views of the local community are that there is adequate housing provision in the village and that the existing green belt surrounding the village should be maintained as is. The Community Council took the view that the local surrounding environment was more important and that additional building would be unsustainable in respect of local infrastructure, environment and transport in the vicinity. In support of this view the Community Council passed a motion earlier this year (2019) indicating it would oppose any substantial housing development within the Village or its surroundings.

The Community Council specifically supports the MIR preferred option to retain the existing Green Belt surrounding the Village and will resist any attempt by developers to build on sites such as Redmoss Grasslands (or any part of) and the site referred to as West Birdston, in addition they would also oppose attempt to further re-allocate land for housing between Milton of Campsie and Lennoxton and would propose that the site already allocated for Housing between the villages is removed from LDP2.

Milton of Campsie Greenbelt Preservation Group - Written on behalf of the 245 members of the Group which agrees with the assessment that the following sites are unsuitable for development:

- *Milton of Campsie Greenbelt Preservation Group - Site S18 Redmoss Farm (North & South), 300 Houses*

Unsuitable for development because:

- The sites are in a Local Nature Conservation Area containing Local Biodiversity Action Plan priority habitat of high ecological value, which are green network hubs.
- The woodland belt east of the Redmoss Farm (South) is a strong, defensible green belt boundary and the area has high biodiversity function and medium/ high green belt functions of settlement setting and recreational use.
- Development of the North site would result in loss of part of a well used open space The sites are in the Glazert Valley Local Landscape Area which is important to the setting of Milton of Campsie

- These sites have very poor access to public transport and are not within reasonable walking distance to Milton of Campsie centre. Therefore, private vehicular travel is likely to significantly increase with these developments which will have adverse impacts on local air quality and related emissions levels and add to traffic congestion on Redmoss Road and Birdston road.
- The proposed access to the North site in Marley Way is not wide enough for a road, would result in loss of green belt land and Marley Way could not support this volume of traffic.
- Nothing has changed in the intervening years (except the building of more houses) to change the LDP Reporters' determinations that the north site is deleted from and the south site is not included in the plan.
- *Milton of Campsie Greenbelt Preservation Group – (Site 205 West Birdston/ East of Alder Road), 53 Houses*

The site is unsuitable for development because:

- It is part of Birdston Woods community woodland and designated open space which is part of the green network, with a core path running through it. Any development here would result in the loss of open space.
- Adverse impact on biodiversity habitats and species, including Local Biodiversity Action Plan priority habitats .
- The site is in an area of medium/high green belt defensibility, as an open space and green network node
- There are TPO trees to the north.
- The sites is not within reasonable walking distance to Milton of Campsie centre. Therefore, private vehicular travel is likely to significantly increase with this developments which will have adverse impacts on local air quality and related emissions levels and add to traffic congestion on Redmoss Road and Birdston
- Nothing has changed in the intervening years (except the building of more houses) to change the LDP Reporters' determination that the site is not included in the plan.
- *Milton of Campsie Greenbelt Preservation Group – (Site S322 Derrywood Road)*. This site is not a "reasonable alternative" site because:
 - It is on greenfield land with semiimproved neutral grassland with scattered trees, some scrub and bramble.
 - The site has poor access to public transport with the nearest bus stops beyond 400m from site. Despite access to the core path network, development of this scale in this location would increase the need to travel with a particular emphasis on private vehicular travel due to the distance from other settlements, local services and amenities, employment centres and rail connection. Due to the layout of the adjacent properties it is also unlikely a more direct active travel route can be created connecting the site with bus services and Milton of Campsie.
 - On average 50% of the households in Milton of Campsie have two cars (higher in private housing) so a development of this size would add around 50 cars which is unsustainable in terms of access to the already heavily used Antermony Road and Birdston Road.
 - Therefore, a major concern with any additional development on this site would be parking in the vicinity of Craighead School which is an ongoing local issue. Scott Avenue and Craighead Road itself are already heavily congested with resident parking and there is no space for two vehicles to pass each other on Craighead Road. The junction of Craighead Road and Antermony Road can be very dangerous due to vehicles parking on the corner, the pavements and outside the Scot Mid shop as well as vehicles entering and exiting the Co-op car park.

- *Milton of Campsie Greenbelt Preservation Group - General*

Milton of Campsie is a community of less than 2,000 houses with a population of 3,890 (2018). In recent years approximately 250 additional houses have been added. The population density of Milton of Campsie is six times higher than the average for East Dunbartonshire and more than 50 times higher than the Scottish average.

The overall cumulative impacts of building the proposed houses in a number of small sites on Milton of Campsie are likely to be significantly negative in nature. This is predominantly through the sites being in unsustainable locations, poor access to public transport which is likely to increase the reliance on car-based travel and lead to adverse effects in relation to Air Quality and increase greenhouse gas emissions. It will also add to existing road traffic congestion and flood risk posing a significant impact on Water Quality and Climatic Factors in the area. Therefore there should be no further housing developments in Milton of Campsie

Montagu Evans, for Caledonian Properties Ltd (site 6.52 Campsie Golf Club) – In relation to the preferred option Caledonian Properties would welcome the allocation of site 6.52. Caledonian Properties would not support the Reasonable Alternative Option as it does not appear to include sites within the current LDP.

Caledonian Properties would also request support of the Council for the proposed new clubhouse site. These works will enable the allocated housing site to be delivered, whilst supporting the long term viability of the golf club. The retention and enhancement of the boundary trees and additional landscaping will contribute positively to the defensible boundary and ecological function of the green belt, whilst supporting the recreational function the golf course provides as part of the green belt.

Caledonian Properties seek the retention of the existing allocation, and are currently progressing proposals with a view to submitting development proposals to EDC within the next few months. The delivery of site is anticipated to be within the lifespan of the emerging LDP. A private housebuilder has been appointed and is currently progressing proposals, and the site will be delivered in a single phase.

NHS Greater Glasgow & Clyde (NHSGGC) –

Preferred Option - NHSGGC do not have a specific view on the proposals within issue 21, however, we are aware of the need to review the potential need for additional health related facilities, if this issue is taken forward. NHSGGC continue to support the need to further and detailed engagement in relation to the potential impact both existing and new developments may have on the delivery of healthcare.

Alternative Option - 6.20 Remaining Phases at Lennox Castle Hospital. As landowner of this site, it is our view that this site should be retained as an effective housing site. The technical issues noted are capable of being mitigated and the development of this site will add to the mix of housing available in the Lennox town area. NHSGGC are more than happy to have detailed discussions with the local authority in relation to this site.

North Planning & Development, for Taylor Wimpey (site ref 6.58 – Lennoxlea & S314 Rowantree Place) – Do not know if it supports the preferred option. Taylor Wimpey are supportive of the ‘Preferred Option’ for Lennox town insofar as it supports the continued allocation of the sites allocated for residential within the current LDP and/or with planning consent, but the ‘Other Alternative Option’ is also required in order that additional land be allocated for residential development at Lennox town in the Proposed LDP.

Taylor Wimpey welcome that the new Proposed LDP will maintain the allocation for residential development at the site ref 6.58 - Lennoxlea.

We are seeking the allocation of further land at site S314 (Rowantree Place), which would extend the development of the Lennoxlea site to the east. The site S314 has a capacity for approximately 100 houses, and so if this site was added to the existing Lennoxlea allocation this would result in a total overall capacity over the two sites of approximately 150 houses. Both sites are under the control of Taylor Wimpey.

The Reasonable Alternative Option's support for the allocation of an additional site at Milton of Campsie indicates that a generous supply of land for housing is required to help ensure delivery, and the reassessment of Lennox Castle can be taken to indicate that site has not been delivering houses as had previously been expected, and that it is anticipated that under-delivery may continue. This all supports the need to ensure that a generous supply of housing sites is provided in order to help ensure delivery, and the additional site at Rowantree Place (Council ref. S314) is suitable, effective and deliverable over the plan period, so should be allocated for housing.

The representation includes further site specific information and background reports to support the proposal at site S314. It also provides specific comments on the content of the Green Belt Review and Site Assessments documents, which relate to site S314. These include that comments in the green belt review confirm that the site can be removed from the Green Belt and be allocated for development without adverse impact on the function or integrity of the Green Belt. Indeed development will result in a more permanent, robust and defensible long-term settlement edge. It notes that the site is effective, sustainably located and is not affected by any insurmountable constraints to development, that the site can be allocated for development without adverse impact on the function or integrity of the Green Belt, and that the comments in the Site Assessment can all be suitably addressed.

Persimmon Homes (site 6.56 Lennox Castle Hospital) –

Preferred Option - It is important that sites that are 100% Affordable Housing are in core areas within settlements.

Alternative Option - Lennox Castle Hospital remains a viable housing site where a national builder is committed to delivering the site and steps are being taken to resolve outstanding flooding concerns.

Roderick Lawson (S375 Kincaidfield) - represent the owners of the attached land at Kincaidfield, Milton of Campsie who would like the site to be considered as eligible to be included in your housing site policy in your draft Local Development Plan. A plan of the area is enclosed.

There is already housing on the north and west side of the area and while it is recognised that the access road may have to be improved, it forms a natural extension of the existing boundaries for the village.

I would appreciate if you could confirm that you will include this site or alternatively offer guidance on what would be required to satisfy your requirements for inclusion in the Development Plan.

Scottish Water - Scottish Water would be keen to work with EDC should the alternative option be taken forward as Water and Drainage Impact Assessments will be required for the alternative site.

SEPA - Again, we support the focus in the Preferred Option on brownfield and vacant land, provided, of course, that it is acceptable in the context of other policy drivers such as avoidance of flood risk.

We note in the "Reasonable Alternative Option" with reference to Site 6.56 Remaining phases at Lennox Castle Hospital the statement "Reason – Site has possible flooding issues but contributes to the longer-term regeneration of the area. It is considered that the flood issues can be mitigated." It is not clear if Site 6.56 remains in the Preferred Option, but for the avoidance of doubt we stress the desirability of flood risk avoidance rather than flood risk mitigation as a long-term sustainable option. SEPA would be opposed in principle to a development which conflicts with flood risk policy as set out within Scottish Planning Policy.

SNH - As regards the sites allocated from the preferred and alternative housing packages we offer the following comments:

- **S321-** St Machan’s Way, Lennoxtown (Preferred package): We note that this is to be subject to further assessment to consider the extent of possible surface water flood risk.
- **S322** (Alternative) - This is a gently sloping site which could accommodate some development. However, it is not clear from where access would be taken. Trees on the site should be retained as far as possible. Links through the site to the woodland beyond and to the core path that runs along the northern boundary of the site should be retained and included as site requirements.

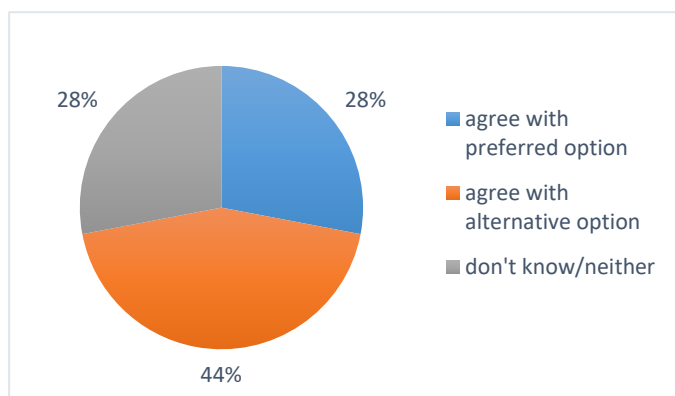
SPT – Agree with the preferred option. The site is well located and accessible by public transport.

Woodland Trust Scotland - Other Alternative Option

S322: We have identified areas of ancient woodland present on the Ancient Woodland Inventory and native woodland present on the Native Woodland Survey for Scotland to the north and east of the site allocation. If this site is taken forward the woodland areas must be protected, and leave a buffer between the development and the woodland areas.

Issue 22 - Should Lennox Castle (Conversion) be identified as an opportunity for reuse/ redevelopment rather than only for housing?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Remove Lennox Castle as a housing allocation	2. Remove Lennox Castle as a housing Allocation and identify it as an opportunity for reuse/ redevelopment of a listed building in the green belt.



Agree with preferred option – 7
 Agree with alternative option – 11
 Other / Don't Know – 7

Summary of Comments from Individuals:

MIR Preferred Option

- Enough houses in that area which is some distance from shops and other facilities in Lennoxtown.
- Lennox Castle site would extend local housing in an area that is close to transport and is an area that still has capacity for development

- The site has been in ownership of developers for some time with no indication of planning permissions being sought, this would indicate that there is no demand for additional properties. In addition further development in this area will place undue pressure and additional demands on local infrastructure and be unsustainable in respect of ecology, environment and transport issues.

MIR Alternative Option

- I believe it would be a great boost to the community to see Lennox Castle brought back to its glory, it holds a great deal of sentiment and historic value to the community.
- The Castle has always been a focal point especially when driving along the Blanefield and Crow Road. It should be preserved.

Other Alternative Option

- Lennox Castle would be a preferred option as the infrastructure can be properly considered to create an attractive addition in a nice landscape that would enhance the area.
- This area is a valuable nature resource, I would hate to see it developed.

Summary of responses from groups and organisations:

Barton Willmore, for Bellway Homes Ltd - MIR Preferred Option – Does not agree

If the site is not deliverable then it should not be included as a housing site.

Historic Scotland - We note that the preferred option is to remove the housing allocation at Lennox Castle, whereas the alternative option is to remove the housing allocation but identify the site as an opportunity for reuse/redevelopment of the listed building. We do not support the preferred option, because it presents no potential solution for the building at risk.

The reasoning given for the preferred option states that the allocation is no longer effective as part of the housing land supply and that the site is constrained by the listed status of the category A listed castle and poor vehicular access.

In our view it is not helpful to identify the listing of a nationally important asset as a constraint against development particularly, as in this case, when the sole reason that development would be acceptable in this location is due to its enabling role for the listed building. We accept that the castle is in critical condition and that substantial enabling development of some kind will be required to secure the future of this asset.

It may be beneficial to remove the current housing allocation if there is a risk of independent development in the vicinity of the castle which would compromise future enabling options. However, in our view if the allocation is to be removed it would be preferable to replace the allocation with a commitment to encouraging restoration/redevelopment of the castle with scope for enabling development to support this. Removing the indicative housing capacity of 33 houses may provide room for a more creative solution to be proposed.

We consider that the alternative option of removing the housing allocation but identifying the site as an opportunity for reuse/redevelopment of the castle and encouraging this reuse is likely to be a more effective strategy than just removing the allocation.

A further option for this site may be to retain a housing allocation at this site with more specific criteria/policies than the existing LDP 2017 allocation to ensure that any housing is strictly tied to enabling the restoration of the A listed building and minimises the impacts on the setting of the asset.

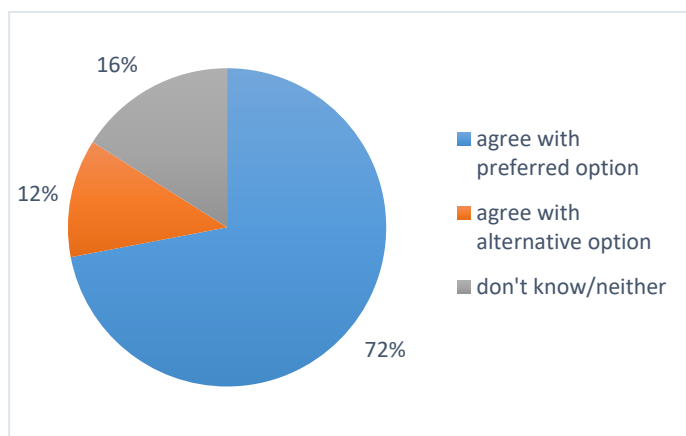
We would be happy to discuss more creative solutions, as we accept that a full restoration of all of the castle will be difficult to fund from development on the site.

Milton of Campsie Community Council – MIR preferred option, Site has remained undeveloped for some time indicating a lack of demand. Additional building is unsustainable in terms of local environmental issues, transport and demands on the local infrastructure.

NHS Greater Glasgow & Clyde (NHSGGC) – It was noted in the Urban Capacity Study that the owner of Lennox Castle is the NHS. This is incorrect and I can confirm that NHSGGC do not own this site.

Issue 23 - How can the LDP support and promote the visitor economy in Lennoxtown, Milton of Campsie, Haughhead and Clachan of Campsie?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Provide criteria to encourage appropriate new visitor economy or tourism development, with specific focus on 'Tourism Asset Areas'.	2. Provide criteria to encourage appropriate new visitor economy or tourism development without specifying locations (Tourism Asset Area approach).



Agree with preferred option – 18
 Agree with alternative option – 3
 Other / Don't Know – 4

Summary of Comments from Individuals:

MIR Preferred Option

- Lennoxtown in particular has a neglected and about it. It should be improved. Visitors have nothing to stop for. The streets are filthy and many of the building in poor repair.
- Could I suggest a more frequent bus service which might encourage people to have a day out to the Campsies
- Better to focus tourist development on particular areas so the appropriate facilities can be provided e.g. parking, provision of maps and good sign posting of paths,

MIR Alternative Option

- n/a

Other Alternative Option

- Re-instate the trains through the area, it would be beneficial to locals and would also attract visitors. Re-surface the car parks.
- Build on existing green areas and walking for leisure is areas that are clearly not urbanised. Better toilets for walkers' use. anything that can be done to support by rate reduction or other means, local pubs, coffee shops and other services. Becoming part of greater Glasgow sprawl will not help this. A better council website promoting villages for leisure. We need to have a period of peace from defending our greenbelt and biodiversity. I have known Redmoss for fifty years. Newts and orchids were common, less so now but it is so important to the identity of the village it should not yet again be considered for development.
- Redmoss conservation and improvement of wildlife would be an attractive area for walking and recreation as it is beside John Muir way.
- Preserve the greenbelt making it attractive to walkers from nearby and promote our local pubs and cafes

Summary of responses from groups and organisations:

SPT – Agree with the preferred option. This encourages best use of the areas assets while seeking to manage and direct demand.

SNH - We support the principle of this approach. It will be important to ensure that criteria to promote the tourism/visitor economy, with specific focus on 'Tourism Asset Areas' provides for their understanding, protection and enhancement.

Planning Authority Response

The Proposed Plan has been prepared taking into account the responses received on the following issues.

Issue 20 – What is the most appropriate way to ensure proposals for land use change or development in Lennoxton reflect the priorities identified in the Lennoxton Place Plan?

The Proposed Plan has been prepared taking into account the responses received on this issue. In the main the responses supported the preferred approach. Whilst support was also expressed for the alternative option, the Council do not agree that any responses received provide a rationale for pursuing the alternative option. The Lennoxton Place Plan covers the period 2018 to 2023 and was reported to the Community Planning Partnership in 2018 after public consultation. The Place Plan is a Locality Plan, produced under the Community Empowerment (Scotland) Act 2015. Scottish Planning Policy section on outcomes identifies that "At the strategic and local level, planning can make a very important contribution to the delivery of Single Outcome Agreements, through their shared focus on 'place'. Effective integration between land use planning and community planning is crucial and development plans should reflect close working with Community Planning Partnerships". Only Place Plan priorities which relate to land use change will be identified in the Plan. Relevant priorities in future Place Plans will be considered during the next review of the Local Development Plan.

Conclusion: Implement preferred option

Issue 21 – Where should new housing in Lennoxton, Milton of Campsie, Clachan of Campsie and Haughhead be located?

In the main the responses supported the preferred approach. Comments agree with development S321 St Machan's Way as it is brownfield land and affordable housing, as long as flood risk is avoided. Whilst some support was expressed for the alternative option of affordable housing at S322 Derrywood Road, in the main objections were received including: the site is valued as green belt and due to likely impacts of traffic congestion and lack of facilities in the settlement. The alternative option is however green field land in the green belt so will not be allocated in the Proposed Plan. Responses were also received from various site promoters, who generally disagreed with the preferred and alternative options. These submissions focused on reasons as to why a particular site should be allocated for development in LDP 2. Please note that any new information that was provided for each site has been incorporated in to the updated site assessments (separate document). Other housing sites suggested by landowners and developers are in the green belt and identified as unsuitable for development, and allocation, in site assessments. The support for existing sites in the Plan is noted and it is considered that the constraints identified in the Housing Land Audit can be addressed during the plan period. Concern about flood risk at the site 6.56 Lennox Castle Hospital will be addressed at planning application stage when detailed site specific proposals and assessments are available.

Conclusion: Implement preferred option

Issue 22 – Should Lennox Castle (Conversion) continue to be designated for housing?

Some responses supported the preferred approach to the site, as there is no demand for houses there, it is not deliverable, environmental sensitivity and the site is remote from facilities.

However more support was expressed for the alternative option and it is agreed that the responses received provide a rationale for pursuing the alternative option. As such the Proposed Plan will reflect the alternative option. This is because there is a desire to see the category A listed building preserved and the alternative option would promote enabling development which resulted in reuse/ restoration of all/ part of the building. It is also acknowledged that housing development in the area unrelated to the castle could prevent enabling development.

Conclusion: Implement alternative option

Issue 23 – How can LDP 2 support and promote the local visitor economy in Lennox town, Milton of Campsie, Haughhead and Clachan of Campsie?

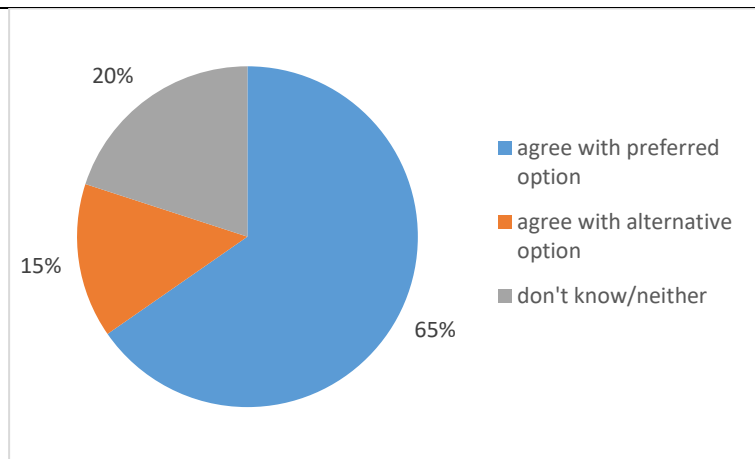
The Proposed Plan has been prepared taking into account the responses received on this issue. In the main the responses supported the preferred approach. This included support for focusing and directing demand for tourist development to asset areas so facilities can be provided and in particular promotion of and improvement to Lennox town for visitors, local pubs and cafes and access to the green belt for walkers. Another comment is that as well as promoting the tourist asset areas the policy criteria should highlight the need for their protection and enhancement. This will be addressed by the amendments to the Proposed Plan's policies for tourism which will complement the policies for the natural, water and historic environment.

Conclusion: Implement preferred option

The Proposed Plan is subject to consultation, with all representations being considered by a Reporter on behalf of Scottish Ministers. This provides a final opportunity for comments.

Milngavie

Community Area/Policy Theme	Milngavie	
Elements of the engagement included:	<ul style="list-style-type: none"> • Questionnaire • Drop In Session • Hard copy paper responses 	
List of Organisation(s) commenting on this topic		
<ul style="list-style-type: none"> • Baldernock Community Council • Baldernock Local History Group (Paul Bishop) • Barton Willmore c/o Cala Homes • Geddes Consulting c/o Cala Homes (West) • Geddes Consulting c/o Mactaggart & Mickel • Gladman Developments • Historic Scotland • Icen Projects c/o Mactaggart & Mickel Homes • Mains Estate Resident's Association (MERA) • McNally Associates c/o Mr K Lawrence and Mr J Lawrence • Milngavie Community Council • Milngavie Community Development Trust (MCDT) • Milngavie Heritage Centre Group • Network Rail • NHS Greater Glasgow & Clyde (NHSGGC) • North Planning & Development c/o Scottish Water • Ryden c/o Stewart Milne Homes & Clober Golf Club • Scottish Water • Scottish Environment Protection Agency (SEPA) • Scottish Natural Heritage (SNH) • Strathclyde Partnership for Transport (SPT) • Transport Scotland 		
Planning authority's summary of the representation(s):		
<p><u>Issue 24 - What is the most appropriate way of integrating the Milngavie Town Centre Strategy?</u></p>		
<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>	
<ol style="list-style-type: none"> 1. Incorporate all actions identified in the Milngavie town centre strategy within LDP 2. 	<ol style="list-style-type: none"> 2. Retain town centre strategy as planning guidance and cross refer where appropriate 	
<p><i>Summary of comments from Individuals</i></p>		



Agree with preferred option – 49
 Agree with alternative option – 11
 Other / Don't Know – 15

The preferred option was overwhelmingly supported. The main reasons suggested by people, along with a number of other comments on the town centre, are set out below:

- Integrating these makes sense as the strategies have the support of local community
- Health of the town centre is key to maintaining a good quality of life and access to services
- Important to fulfil action for permanent space for Milngavie's rich heritage to boost footfall
- Having them as separate documents is cumbersome and more difficult to read for the public
- Support Council in safeguarding land at St Joseph's site for health hub.

Summary of responses from groups and organisations:

Milngavie Community Council - Agree with the preferred option to incorporate the actions identified in the Milngavie Town Centre Strategy within LDP2. Details of the actions may be refined later in the process. We are particularly keen to see the Town Hall/Lillie Art Gallery and Library/Community Education Centre sites better integrated with the precinct, as these are important cultural, educational and recreational resources.

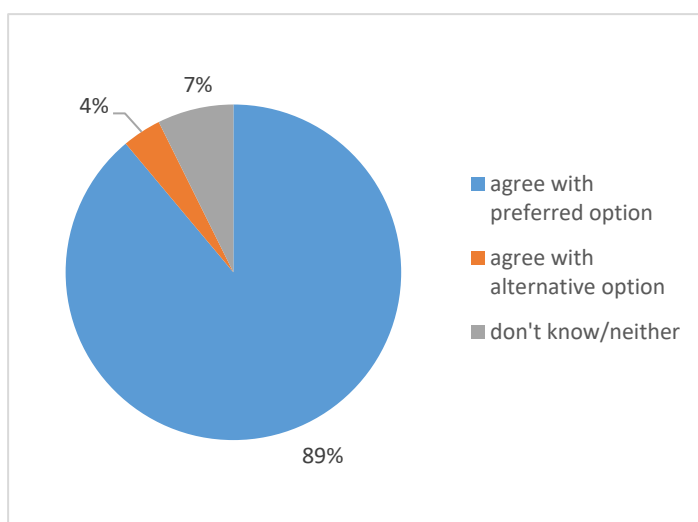
MERA – Supports the alternative option to retain as separate planning guidance as actions are not intended to be conclusive or finite. Should be cross-referred where appropriate. Keen to see re-introduction of free parking for limited periods. The library/community education centre should be included within the town centre boundary for planning purposes.

Geddes Consulting c/o various - Support alternative option. All identified plans and strategies were produced at different points in time, have conflicting status (statutory / non-statutory) and will be required to be updated at a point in the future. Accordingly, the Milngavie Town Centre Strategy will also be required to be refreshed as a result of these evolving plans and strategies. Given the changing nature of these plans and strategies, the actions identified in the *Milngavie Town Centre Strategy* may also alter in terms of timescale, lead partner and relevance. The Reasonable Alternative Option is therefore supported and the policy framework of the Proposed LDP 2 should retain the town centre strategy as planning guidance and cross refer where appropriate.

SPT – Agree with the preferred option. To not include the strategy actions within LDP2 would lessen their status

Issue 25 - Where should new housing in Milngavie be located?

Preferred Option	Reasonable Alternative Option
<p>1. Allocate the sites from the preferred housing package (see Issue 34) within Milngavie, in addition to the sites within the current LDP and/or with planning consent:</p> <ul style="list-style-type: none"> • S361 Drumclog Avenue. 2 homes. 	<p>2. Allocate the following sites from the alternative housing package (see Issue 34) :</p> <ul style="list-style-type: none"> • S227 'Halley's Garage' site (Arnold Clark) (possibly for age exclusive/ retirement housing). 50 homes.



Agree with preferred option – 521
 Agree with alternative option – 22
 Other / Don't Know – 43

Summary of comments from individuals

The Council received a large number of responses in support of the Council's preferred option. In particular, most responses expressed concern about the potential impact of various proposed sites submitted at the 'call-for-sites' stage, including the areas known locally as 'Craigdhu Wedge' and 'Dougalston'. These mainly related to sites **S16, S25, S49, S300, S301, S302, S313, S15, S186, S223**. For the wider Bearsden and Milngavie area, a total of 393 emails were received, together with 151 completed questionnaires and 26 letters. In addition, 68 people attended our consultation 'drop-in' event in The Fraser Centre, during which a large number of comments were made via posters and discussions with officers. Taken together, these concerns covered a wide range of issues and broadly speaking related to one or more of the following:

- Protection of the greenbelt and importance of preserving open space and recreation land
- New development would have an unacceptable impact on road traffic and local infrastructure
- Increased pressure on local services and community facilities including GP surgeries, schools, nurseries and other health facilities
- Lack of water and waste water infrastructure capacity
- Negative impact on local air quality
- Loss of agricultural land
- Negative impact on woodland, wildlife habitat and biodiversity

- New development would lead to increased carbon emissions and would be incompatible with climate change targets
- New development would increase the risk of flooding
- Important to prevent the coalescence of Bearsden and Milngavie, as they are two distinct communities
- Protection of historic buildings and structures such as the Doocot at Dougalston
- Protection of Local Nature Conservation Area (Dougalston)
- New housing should only occur on brownfield land

A smaller number of responses opted for the alternative option to include site **S227**, as it was suggested there is a need to retirement housing in the area. Also, this type of housing would not cause much of an issue in terms of additional traffic, it was suggested. In addition, other responses stated that there is a need for more housing generally in the area, especially affordable housing.

A smaller number of comments were made in relation to other sites within the settlement area including **S336 Ashburn Rd/Craigielea Cresc, S220 Edgehill Road and S317 Mugdock Road**. It was considered vital to protect these spaces as they are considered important for health and wellbeing, nature conservation interest, reducing pollution and improving air quality.

Summary of responses from groups and organisations:

Note: New or updated information received from developers and key agencies on individual sites has been incorporated into the relevant site assessment, which have been updated separately.

Milngavie Community Council – Support the Council’s preferred option. Site S361 should be confined to lower area to avoid the Milngavie Reservoirs designed landscape and SSSI. Oppose alternative option site at Halley’s Garage if this increases traffic problems on A81. Could potentially be resolved in future if issues at Burnbrae Roundabout are addressed. Keen to protect Milngavie’s special natural and built environment.

MERA – Support the preferred option and also allocation of the site from the alternative package (S227 Halley’s Garage) as it would be an excellent opportunity for residents to downsize freeing up family homes elsewhere.

Baldernock Local History Group (Paul Bishop) – Agrees with preferred option in relation to sites S15A, S186 and S223 as any developments on the sites being assessed for housing development around Milngavie would have a physical (direct) and highly negative impact on designated built heritage areas, including listed buildings, gardens & designed landscapes (documentation provided).

Ryden c/o Stewart Milne Homes & Clober Golf Club – Note that good progress is being made with bringing forward existing site LDP 6.5 (Clober Golf Club) and may be safely regarded as part of the effective land supply. It is anticipated that a planning application will be submitted in mid-2020.

McInally Associates c/o Mr K Lawrence and Mr J Lawrence (S16 Hunter Road) – Disagree with the preferred and alternative options. Object to the non-inclusion of S16 Hunter Road as a new housing site for affordable housing for the elderly. Such a development would help fund the enhancement of the wider area of open space/community woodland.

NHS Greater Glasgow & Clyde (NHSGGC) – NHSGGC do not have a specific view on the proposals within issue 25. As has been referred to in the site assessment document, there is a lack of capacity within the West Locality (Bearsden & Milngavie) of East Dunbartonshire and therefore, there is a need to review the potential need for additional health related facilities, if this issue is taken forward. NHSGGC continue to support the need to further and detailed engagement in relation to the potential impact both existing and new developments may have on the delivery of healthcare.

Barton Willmore c/o Cala Homes (S25 Old Mains Farm) - Disagree with preferred and alternative options, and non-allocation of site S25. Consider that EDC should have been more flexible in their approach to land release with potential future growth in mind, rather than the conservative approach taken thus far. Significant land releases on greenfield sites and the ongoing redevelopment of brownfield land for housing is required to meet the future housing needs and demand. It is essential that a future development strategy is based on a scale of land release that is proportionate to the relative size of the town. Restricting future growth in Milngavie will only adversely impact on its sustainability and wellbeing. The Council therefore has an opportunity to reconsider the proposed development at Old Mains Farm (Ref. S25), Milngavie. This is a site which is effective and can deliver housing completions within the first five year period of the Local Development Plan. The sustainable site at Old Mains Farm offers an excellent opportunity for the delivery of a mix of homes for a broad range of the community.

Gladman Developments (S300 Prestonfield) - We do not agree with either the Preferred or Reasonable Alternative option in relation to Issue 25 and new housing in Milngavie. We have addressed the issue of housing land within our response to Issue 34 but would stress the sites identified within the preferred and alternative options are not sufficient to address the housing need we have identified. It is therefore essential that further sites must be released for housing in Milngavie, a place where people want to live.

The proposed site at Prestonfield, Milngavie (MIR Site Ref: S300) that Gladman are promoting is a sustainable and logical extension to Milngavie. The representations submitted specifically in relation to this site, along with the supporting information noted, demonstrate that the site is effective and should be considered appropriate for housing within the Proposed Plan. We therefore recommend that the Council's housing allocations in Milngavie be amended to include the site at Prestonfield, Milngavie (S300).

Geddes Consulting c/o Cala Homes (West) (S49 Tambowie Farm) - Disagree with preferred and alternative options and non allocation of site S49. The development strategy for the East Dunbartonshire local authority area requires modification to meet the growth estimates set out by the approved Clydeplan Strategic Development Plan (SDP) and Scottish Government. The latest 2016-based Principle Household Projections illustrate that household growth across East Dunbartonshire from 2016 to 2032 is projected to be an estimated 4,181 new homes. Taking account of the existing need of circa 900 homes this equates to housing need and demand / housing supply target of 5,081 homes. This matter is discussed in detail in response to Issue 34: Housing Land Requirement. Significant land releases on greenfield sites and the ongoing redevelopment of brownfield land for housing is required to meet the historic as well as future housing needs and demand to help retain and attract families back. The town's current housing land supply will run out in less than 5 years.

Iceni Projects c/o Mactaggart & Mickel Homes (S302 Chestnut Lane) - Disagree with the preferred and alternative options. Object to the non-allocation of the site at Chestnut Lane S302. The proposed site is an effective and deliverable development location, in an edge of settlement location. In planning policy terms, there is requirement from East Dunbartonshire Council to provide for additional homes within the Plan area. It is clear that there continues to be underlying issues within East Dunbartonshire with affordable housing backlog, and the need for entry family housing and those who wish to downsize and remain within the locality. From a town planning perspective, this is an edge of settlement site that allows for the creation of a long term, sustainable and defensible green belt boundary.

This proposal provides the opportunity for a unique multi-tenure housing led development that can meet current needs. By providing smaller homes and contributing to the requirement for new households in the area this site can cater for those in housing need are simply not catered for at present in the area. This will be affordable housing, albeit not simply social rented accommodation. It will include smaller market housing for individuals, houses for downsizers, smaller families and provide an opportunity for investment in affordable housing.

North Planning & Development c/o Scottish Water (S350 Former Sewage Works) - Scottish Water are supportive of the 'Reasonable Alternative Option' for new housing at Milngavie, which establishes that additional brownfield and some greenfield sites be brought forward for residential development. This is a reasonable and proportionate approach and will ensure that there is a generous and effective housing land supply, and that suitable range and choice of housing is provided at Milngavie. Scottish Water are supportive of this approach and advocate that land at Auchenhowie Road, Milngavie be allocated for residential development in the Proposed LDP. The Auchenhowie Road site was not submitted for consideration at the earlier Call for Sites stage. The Auchenhowie Road site is a Scottish Water landholding and is unused and surplus to Scottish Water operational requirements.

The Scottish Water site at Auchenhowie Road is a brownfield site which falls within the Council definition of 'derelict land' where re-use and regeneration and redevelopment is supported, and the site is relatively level throughout and so can be easily developed. The site is immediately adjacent to the Milngavie settlement boundary, as defined in the currently adopted Local Development Plan, and as it has semi-urbanised sports uses on all sides it is an infill site and forms a functional part of the urban area.

Albeit the site is within the green belt, as currently defined in the adopted Local Development Plan, it is brownfield, modestly sized and sits within strong and defensible boundaries formed by the afore-mentioned sports uses, particularly the Milngavie and Bearsden Sports Club and the Rangers FC Training Facility. The existing green belt function here is compromised by the function and characteristics of these afore-mentioned sports uses, and these uses form the functional outer edge of the Milngavie settlement. The Auchenhowie Road site is a brownfield infill site, and development here will not compromise the integrity of the green belt or set an undesirable precedent as it will sit within the referenced semi-urban sports club uses and not on the outer edge of the functional settlement. Given the limited size of the site, its defensibility due to the sports uses beyond, the site does not form a meaningful green belt purpose or function, and its release for residential development would therefore not undermine the overall integrity of the green belt.

The site is near services and facilities and close to well established existing residential areas. Vehicular, pedestrian and cycle access can be taken from the existing access on Auchenhowie Road, which provide good access links to local schools, bus stops, the town centre and public transport connections. It is approximately 1km from the site to Milngavie Railway Station and the town centre is just beyond.

Despite proximity to the Allander Water the site is not known to have previously flooded or to be protected by a flood defence, and the SEPA Flood Map does not identify the site as being at risk of river flooding. This brownfield site is within the functional urban area, represents a small infill site and development of the site will not undermine the integrity of the green belt, it is sustainably located with good accessibility to employment, public transport, schools and local facilities and residential development, to include an element of affordable housing, can be appropriately accommodated on this site.

The Auchenhowie Road site is brownfield and so is duly favoured for redevelopment by planning policy, including in SPP. The site is effective relative to the tests of PN 2/2010, is sustainably located and is not affected by any insurmountable constraints to development, and the site can be allocated for development without adverse impact on the function or integrity of the Green Belt.

Geddes Consulting c/o Mactaggart & Mickel (S15 & S359 Dougalston) - Disagree with preferred and alternative option. The development of site ref: S15 for housing will enable the biological improvements (upgrading of woodland, Loch and existing walkways) within the wider site area (Ref: S359). The Revised Specialist Appraisal (Appendix 1) highlights that there are no significant constraints to the development of the site. The site is effective and will be delivered within the period of the Proposed LDP 2. The Updated SEA Assessment (Appendix 2) demonstrates that the site should be considered to have an overall minor positive/neutral score against the SEA criteria. The Economic Impact Note submitted in support of this

representation outlines the potential gross economic benefits that will be generated by residential development at Dougalston, Milngavie (Ref: S15 & S359). The Note identifies that the development of the site will create 65 direct construction jobs and a further 39 indirect jobs during the construction phase.

On completion of the development, the Economic Impact Note predicts household expenditure per annum of £1.3m and a resident workforce GVA (Gross Value Added) of £3.0m. The development will therefore provide significant economic benefits to the local economy. Accordingly, there are no planning or environmental reasons why Dougalston, Milngavie (Ref: S15 & S359) should not be allocated for housing in the Proposed LDP 2.

Scottish Water - Scottish Water will require Water and Drainage Impact Assessments to be completed for site S227 to ascertain what (if any) impact the developments have on the local network.

SEPA - support the focus in the Preferred Option on brownfield and vacant land.

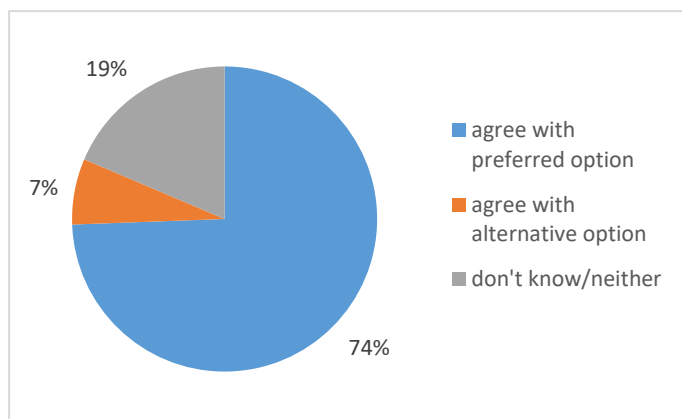
Baldernock Community Council – (S15, S359, S186 Dougalston Estate) - Although these sites are outwith the Parish of Baldernock we would wish to add our concern that these sites are of valuable conservation and historic relevance. Once again development in these sites would take away from East Dunbartonshire valuable areas of natural beauty and places of rest and nurture of both animals and plants as well as contributing the well-being of those who live in East Dunbartonshire. Development on a nature conservation area would adversely affect the value of biodiversity. Houses in these areas would increase the already congestion on local roads. These developments would also increase the pressure on local schools and health services, which are fully stretched.

SPT – Agree with the preferred option. On the alternative option - The proximity of the site to the A81 the Bearsway means that site is highly accessible and in close proximity to local facilities.

SNH – Agree with preferred approach

Issue 26 - What can the LDP do to address problems on the A81 transport corridor?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Implement Local Transport Strategy and Active Travel Strategy:	2. Implement LTS and ATS but remove Allander rail halt safeguarding from plan



Agree with preferred option – 64
 Agree with alternative option – 6

Summary of comments from individuals

Whilst the vast majority of responses were in favour of the preferred option to implement the LTS and ATS, this issue generated a wide range of comments and concerns relating to transport in Milngavie. The preferred option was largely favoured for at least one of the following reasons:

- Would help to alleviate parking issues in and around Milngavie station
- Helps to tackle climate change by encouraging people not to drive
- Support a quality bus corridor and junction improvements on A81
- Delivering the ATS and LTS should be prioritised. Modal shift is essential
- Integration and scheduling of public transport is vital, including to peripheral areas
- Important to improve local path network to surrounding areas
- Imperative that rail service is improved

In terms of other comments and concerns relating to the A81 transport corridor, key points are set out below:

Active Travel

A substantial number of comments referred to the existing Bears Way segregated cycle way, and in particular its future status. A number of responses suggested that it should be removed and replaced by a shared bus, taxi & cycle lane. Others stated that it should not be extended, while a number of responses suggested it should be extended further into Glasgow, to provide a safer cycling environment and encourage more people to use it. It was also considered by some that the junctions are unsafe in places, resulting in some cyclists choosing to use the main road carriageway. Other comments included:

- Important to protect footpaths including those through green areas
- Footpaths in the Dougalston area should be repaired
- Better cycle provision is required however it should not be where there is no room for a cycle lane
- A cycle path should be connected to Douglas Academy

Bus

There were a substantial number of requests for improved bus services including a direct bus link to the Queen Elizabeth University Hospital, better integration between bus and train, a bus lane for commuters and an express bus service at peak times.

Rail

There was significant support for improved rail services and infrastructure, notably the dual tracking of the Milngavie line and more frequent services. A large number of responses also outlined their strong support for an additional station at Allander. One comment however suggested that an additional station at Allander is not required as there is a station at Hillfoot within healthy walking distance

Roads

A number of comments alluded to traffic congestion, particularly at peak times. It was noted that there is congestion on the A81, A807 Auchenhowie junction, with rat-running drivers causing road safety issues for pedestrians including children.

Parking

A substantial number of comments called for the re-introduction of free parking, for short term stays within Council car parks. In addition, there was widespread support for additional parking at rail stations.

Summary of comments from groups and organisations:

Transport Scotland - The body of their response reiterated previous comments made on rail infrastructure and the safeguarding of land for a station at Allander. In terms of Allander, TS stated they did not support further feasibility/delivery work on the station at this time. In a previous response TS stated they did not support safeguarding land for stations if there wasn't a commitment for this further feasibility work. TS also reiterated examples of ongoing work which is being carried out by ScotRail and Network Rail to improve performance on the Milngavie line and noted that performance has been improving since the December 2018 timetable change.

SPT - Implementation of the LTS and ATS actions through LDP2 strengthens the status of these strategies and reflects the intrinsic relationship between transport/access and land use.

The safeguarding of the land for a potential station at Allander is supported as it does not commit to the delivery of the station but it does not preclude the delivery of a station at this location should this be identified in the future.

Network Rail - Agree with the preferred option. Network Rail are engaged with East Dunbartonshire Council and the consultants on their A81 corridor study and support the Preferred option for Issue 4 which seeks to implement the actions and projects identified in the Council's Local Transport Strategy. However, the proposed location for a potential station at Allander is only approximately 1.3km from the existing Hillfoot Station and 1.4 km from Milngavie Station. It has been advised previously by Network Rail that this may raise issues in terms of achieving appropriate line speed between stations and impacts on existing and future timetabling, and a STAG study which includes investigation of these issues is welcome.

Milngavie Community Council – Support preferred option and strongly believe Allander Rail Halt development should be a priority. Suggestions for future actions include:

- Implementing 'linear park' from Auchenhowie Road to Hillfoot.
- Identify suitable land for park and ride near proposed Allander rail halt (strongly oppose raised decking car park at station)
- Restoring bus services, especially to Mugdock Park and reservoirs
- Work with local community to develop safe cycling and walking to schools and sports centre.
- Provide cycleway along Woodburn WAY and by-pass for the precinct to provide easier access to station, town hall and cyclists from west of Milngavie (e.g. remove central reservation)
- Investigate feasibility of 20mph zone in residential areas

MERA - MERA supports implementation of the Local Transport Strategy and Active Travel Strategy actions through the Local Development Plan. MERA strongly objects to the proposal of removal of the Allander rail halt safeguarding. Key projects include:

- Enhancement of the path and cycle network in Milngavie: encourage additional off road cycle routes. Suggest new route connecting Douglas Academy to Allander Sports Centre via Mains Estate Park and Craighdu Wedge.
- A quality bus corridor on the A81: to improve air quality, reduce congestion. Bearsway could be relocated.
- Investigating increasing parking capacity at rail stations on the A81 corridor: Support decking where practicable and achievable in keeping with setting.
- Undertake a STAG study to assess options for improving performance of the Milngavie railway line: Support the double tracking of Milngavie line.

- Safeguard land for a potential rail station and associated parking at Allander: Strongly support safeguarding of land for new station.
- Deliver junction improvements on the A81: Requires consultation with local residents and users
- Improve Canniesburn Toll for all road users: Works well at present so any changes should be undertaken with great caution. No action should be an option if there is no improvement in air quality.

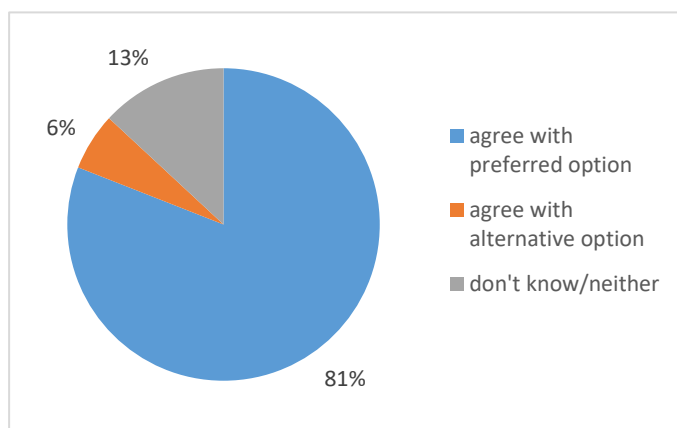
Barton Willmore c/o Cala Homes - Disagree with preferred option. It is considered that the proposed lack of housing allocations will impact significantly through the limitation of available funding that can go towards infrastructure projects from major new housing developments.

Geddes Consulting c/o various - Support the reasonable alternative option. Given the changing nature of these strategies, the actions identified in the Active Travel Strategy (2015) and Local Transport Strategy 2013-2017 may also alter in terms of timescale, relevance and commitment.

SEPA - We support the Preferred Option, including enhancement of the path and cycle network and retention of the safeguarding of the rail halt at Allander.

Issue 27 - How can the LDP support and promote the local visitor economy?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Provide criteria to encourage appropriate new visitor economy or tourism development, with specific focus on 'Tourism Asset Areas'.	2. Provide criteria to encourage appropriate new visitor economy or tourism development without specifying locations (Tourism Asset Area approach).



Agree with preferred option – 68
 Agree with alternative option – 5
 Other / Don't Know – 11

Summary of comments from individuals

Responses were overwhelmingly in favour of the preferred option. A number of suggestions and further comments were submitted as part of some responses. These are summarised below:

- A visitor or welcome centre for the West Highland Way should be provided at the community and education centre

- We can do more to promote the town as an international walking destination
- Need to build on the potential of the art gallery and reservoirs
- Scottish Water should be encouraged to remove the unsightly fencing around the reservoirs
- Any tourism facilities must be authentic and relevant to the local area
- Need a permanent heritage space in the town centre, particularly if it is linked to the new Hub
- Important to provide public toilets with longer opening hours
- More people would visit if they could cycle safely – need to finish the Bearsway project
- Should promote other walking routes such as Clyde Coastal Path and Allander Way
- People need to be encouraged to walk to Mugdock Country Park, rather than drive
- Could have a guided nature walk every month to generate interest

Summary of comments from groups and organisations:

Milngavie Community Development Trust - Proposed Plan should include reference to Gavin’s Mill as an important listed building as this would assist the Gavin’s Mill Community Project

Milngavie Community Council – Support preferred option and principle of Tourism Asset Areas. The precinct is a valuable asset and envied by other BIDs. Concerns about the design of proposed Hub which would affect the Lillie Art Galleries setting. Also need investment in outdoor sports pitches and facilities.

MERA - supports the aspiration to develop an appropriate and sustainable visitor economy/tourism development, with specific focus on ‘Tourism Asset Areas’. MERA confirms that for Milngavie the Tourism Asset Areas should include: • West Highland Way, Clyde Coastal Path, Allander Park, Mugdock Wood & Mugdock Country Park (including Milngavie Reservoirs). • Milngavie Town Centre (including Lillie Art Gallery).

Geddes Consulting c/o various - Agree with preferred option

Historic Scotland - We are content with the preferred option which suggests providing criteria to encourage appropriate new development with focus on Tourism Asset Areas (TAA). We note that for Milngavie the Milngavie Reservoirs are being considered as a TAA and as such consultation with HES regarding the proposed criteria will be required. The reservoirs are category A listed structures as well as designated as a nationally important Inventory garden and designed landscape. The reservoirs are already open to the public and while increased tourism could potentially be beneficial, we would also note that any criteria proposed will need to ensure there are no significant adverse impacts on the site, character or setting of these assets.

SPT – Agree with the preferred option. This encourages best use of the areas assets while seeking to manage and direct demand.

SNH - We support the principle of this approach. It will be important to ensure that criteria to promote the tourism/visitor economy, with specific focus on ‘Tourism Asset Areas’ provides for their understanding, protection and enhancement.

Planning Authority response

The Proposed Plan has been prepared taking into account the responses received on the following issues.

Issue 24 - What is the most appropriate way of integrating the Milngavie Town Centre Strategy?

The vast majority of responses supported the preferred approach, and that the strategy should form an integral part of the overall plans for the area. It was clear that this was considered the best way to elevate the status of the strategy, protect the town centre and support future enhancements as set out in the

strategy. The Proposed Plan is subject to consultation with all representations being considered by a Reporter on behalf of Scottish Ministers, this provides a final opportunity for comments.

Conclusion: Implement preferred option

Issue 25 - Where should new housing in Milngavie be located?

A very large number of comments from local residents were received expressing strong support for the preferred option. There was also support from SEPA, SNH and SPT, particularly in terms of focusing on brownfield development as a priority. The Council also received responses from various site promoters, all of whom disagreed with the preferred and alternative options. These submissions focused on reasons as to why their particular site should be allocated for development in LDP 2. Please note that any new information that was provided for each site has been incorporated in to the updated site assessments (separate document). Overall, the Council does not agree that there is sufficient rationale to deviate from the preferred option. The Proposed Plan is subject to consultation with all representations being considered by a Reporter on behalf of Scottish Ministers, this provides a final opportunity for comments.

Conclusion: Implement preferred option

Issue 26 - What can the LDP do to address problems on the A81 transport corridor?

The vast majority of responses supported the preferred approach, and that issues relating to the A81 should be addressed through both the Local Transport Strategy and Active Travel Strategy, and that this strategy should form part of LDP 2. A period of consultation was held in September – November 2019 on the Draft Local Transport Strategy 2020-2025. This period of consultation overlapped with the Main Issues Report consultation. The vast majority of comments received through the MIR consultation were therefore also received and considered through the process of finalising the [Local Transport Strategy 2020-2025](#). The Proposed Plan is subject to consultation with all representations being considered by a Reporter on behalf of Scottish Ministers, this provides a final opportunity for comments.

Conclusion: Implement preferred option

Issue 27 - How can the LDP support and promote the local visitor economy?

The preferred option was clearly supported. The Council will consider relevant suggestions as part of the drafting of this policy.

Conclusion: Implement preferred option

The Proposed Plan is subject to consultation, with all representations being considered by a Reporter on behalf of Scottish Ministers. This provides a final opportunity for comments.

Torrance and Baldernock

Community Area/Policy Theme	Torrance and Baldernock									
Elements of the engagement included:	<ul style="list-style-type: none"> • Questionnaire • Drop In Session • Hard copy paper responses • Email 									
List of Organisation(s) commenting on this topic										
<ul style="list-style-type: none"> • Baldernock Community Council • Dawn Homes • Jigsaw Planning, for Ferrymill Motors • Montagu Evans, for Caledonian Properties • NHS Greater Glasgow & Clyde (NHSGGC) • Scottish Water • Scottish Environment Protection Agency (SEPA) • Scottish Natural Heritage (SNH) • Strathclyde Partnership for Transport (SPT) • Torrance Housing for the Elderly Initiative 										
Planning authority's summary of the representation(s):										
Issue 28 - Where should new housing in Torrance and Baldernock be located?										
<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>									
<p>1. Allocate the sites from the preferred housing package (see Issue 34) within Torrance and Baldernock, in addition to the sites within the current LDP and/or with planning consent:</p> <p>S204 East of Ferrymill Motors, Torrance.</p>	<p>2. Allocate the sites from the alternative housing package (see Issue 34), none of which are located in Torrance and Baldernock.</p>									
<div data-bbox="204 1581 879 1995" data-label="Figure"> <table border="1"> <caption>Survey Results for Issue 28</caption> <thead> <tr> <th>Response</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>agree with preferred option</td> <td>59%</td> </tr> <tr> <td>agree with alternative option</td> <td>8%</td> </tr> <tr> <td>don't know/neither</td> <td>33%</td> </tr> </tbody> </table> </div> <p data-bbox="300 2024 647 2051">Agree with preferred option – 7</p>			Response	Percentage	agree with preferred option	59%	agree with alternative option	8%	don't know/neither	33%
Response	Percentage									
agree with preferred option	59%									
agree with alternative option	8%									
don't know/neither	33%									

Agree with alternative option – 1
Other / Don't Know – 4

Summary of comments from individuals:

MIR Preferred Option

Support as this is an infill site and is situated on a brownfield site. Its development thus limits loss of greenbelt. Torrance and Baldernock are not connected or related as communities, so support allocation of S204 East of Ferrymill Motors for Torrance.

Object to Ferrymill Motors Site (S204) because:

- Need to retain individual characteristics of small communities, so does not want Torrance to be expanded into a dormitory town without a recognisable village centre, like Milton of Campsie.
- Land on the site was changed from green belt to brownfield, including a section which was laid out with hard standing, without planning permission
- Too much road and traffic congestion on the B822 road, and around the school. It has been getting busier and concerned about road safety, including it is more dangerous for cyclists at junction with new housing development. Therefore concerned at increase in traffic from new development.
- Hedge and trees screen the business from housing and should be retained if there is any development, especially along northern green belt edge.
- The former right of way should not be reopened, it has been closed for approx 30 to 40 years and is overgrown, opening it could lead to crime, anti social behaviour and dog fouling; There are plenty other path options in the village
- field north of site is flooded;
- there is intrusive noise and air pollution from the business so it is unsuitable to locate housing development next to it
- the business does not intend to relocate because of the number of local staff it employs;
- public transport in Torrance is infrequent, unreliable and takes a convoluted route;
- there are no facilities to support a larger population.
- Drainage on adjacent fields and on the site is poor.
- Housing is incompatible with the existing adjacent business use
- Disagree with proposed mitigation to reopen blocked right of way
- Trees and hedges on the boundary must be retained
- This site could lead to pressure for further development

This Ferrymill Motors Site (S204) should only be made available for development or reinstatement to rural uses if the business relocates. In this case a lower density of housing should be required of the developers to reduce traffic impact. Site layout should not provide for future access to greenbelt land.

If the site is developed the hedge and trees on the site boundaries should be retained to screen the business, visual and noise, and provide a firm green belt edge to the north.

MIR Alternative Option – Reassess Site 6.16 Balmore Garden Nursery, Baldernock

- Torrance and Baldernock are not connected or related as communities, so support allocation of 6.16 Balmore Garden Nursery for Baldernock.
- Sufficient recent housing development within vicinity of Option 1, little or none adjacent to Option 2, where the site is currently derelict.
- I have concerns over the erosion of the village of Torrance. It does strike me the Balmore Garden Nursery may have better access to roads (West Balgrocan Rd) and unlike Ferrymill Motors (recently Green Belt) has been a brown field site for a long time.
- Object to alternative site for same reasons as objection to preferred option for Torrance, except right of way. Preferable to 'Ferrymill' site for obvious reasons.

- Also, if any sites in Balmore are allocated for housing (Balmore Paddock and Balmore East, which I believe may be revisited), attention should be given to addressing the road issues on the A807. A suitable road crossing needs to be put in place allowing safe access to North and South Balmore. Residents feel very unsafe crossing Balmore Road at the junction with Glenorchard Road.

David Morrison (Site S221 – East Balmore) – Owns land at Balmore in conjunction with Peter Stirling and Graham Foreman. Noted that the site S221 – East Balmore has not been proposed for allocation in the Main Issues Report. Notes there does not appear to be any mainstream housing sites identified in Baldernock, Torrance area.

In original submission identified benefits to Balmore’s paths, pedestrian safety, traffic calming and car parking for the local hall. Has subsequently met with members of Baldernock Community Development Trust and the Community Council and their plans for an active and long term community facility for the village would be aided by these measures.

The land east of the site is being planted with woodland, which will be a significant change to the overall landscape. This will also provide a permanent and robust eastern boundary to the village and enclose the proposed site within the village envelope. Invite the Council to review this information and consider designating this land for housing.

Other Comments

- No more housing in this area. 19 council flats have just been built in Torrance with very little consideration for the people of Torrance or the existing amenities. Stop building houses in our village!
- I am not in favour of any sites in this area being designated for building development, and indeed I think this should be minimised for the whole of East Dunbartonshire: I was surprised to see so many sites under consideration in the MIR. As the assessments demonstrate, there are serious pressures on infrastructure and services in the area and these will only be exacerbated by existing extensive developments in, for example, Milngavie, Bearsden and Lenzie, none of which seem necessary or desirable. Above all, I would urge continued rigorous protection of the green belt as the number 1 key asset of East Dunbartonshire as mitigation against overcrowding, compromised mental and physical health and climate change.
- Supports stringent protection of the green belt/ undeveloped rural land from building development, throughout East Dunbartonshire (and throughout Scotland and the rest of the UK). This is because it is important for: Wildlife and their habitats, both animals, trees and plants, human health and well-being, particularly mental health and recreation - walking, cycling, horse riding, golfing and informal play , including football.
- Given concerns about climate change, we need all the green space possible, not only to absorb carbon dioxide, but also as places of local food production as we increasingly recognise and, hopefully, adapt to the environmental cost of food miles. Should value rural land much more highly for its value as a resource for sustained and sustainable health and well-being, than for building development, which would be much more appropriate on brownfield sites.
- Welcome the protection of the greenbelt in Baldernock from development
- We need social housing and affordable family housing
- Agree with the preferred option for Baldernock, there is no infrastructure to support develop
- Kelvindale Nursery must be for older peoples housing and develop as soon as possible
- Baldernock Cemetery should not be extended. It is a small ‘country’ cemetery and should not ‘spoil’ the conservation area.

Summary of responses from groups and organisations:

Note: New or updated information received from developers and key agencies on individual sites has been incorporated into the relevant site assessment, which have been updated separately.

Baldernock Community Council (Site S221 – East Balmore) - Suggested Housing Site This proposed site is of particular concern to the community of Baldernock. We as a community value the particular assets that we offer to East Dunbartonshire in our 'rural' setting providing opportunities for walking, cycling and an enjoyment of the countryside. With this in mind we would agree with East Dunbartonshire's concern that this site is unsuitable for development as it takes away from the countryside setting of Balmore and the green entrance to the village and is an encroachment on Green Belt. As there are no immediate facilities available the additional houses would increase vehicle traffic onto an already busy road. Bus services are infrequent.

The development also appears to go against East Dunbartonshire's policy of developing on brownfield sites. 'The remediation and redevelopment of brownfield land, vacant and derelict sites and potential contaminated land sites should be exhausted before considering any development on existing green belt and open space land.'

We would also add that very often in your reports there seems to be a confusion of the understanding of Baldernock which includes the villages of Balmore and Bardowie as well as the farmlands to the north of Balmore Road. As outlined above we offer very specific aspects to East Dunbartonshire being a rural area so near and accessible to the built up areas of Milngavie and Bearsden.

Dawn Homes (Site S222 South Campsie Road) - Do not agree with preferred option - Support Issue 34 Alternative Option 3 and therefore do not object to inclusion of S204 East of Ferrymill Motors in the Proposed LDP, although have doubts about site 6.16 Balmore Garden Nursery. Site S222 South Campsie Road should be added to the sites for Torrance. Responses to the development proposal's site assessment include: it can avoid the Torrance Marshes LNCS and not impact negatively on it; it would not impact negatively on the setting of Torrance as there is development north of the road and a new defensible boundary could be provided along the eastern edge of the site; it would not impact on the operation of a farm; site is no less accessible to public transport, active travel than S204 or the development to the north, and would not make traffic worse than these; impact on Antonine Wall buffer could be managed; a drainage impact and flood risk assessment would be carried out; there has been no objection from SNH on biodiversity impacts; the proposal is next to development to the west and north and would consolidate settlement pattern. The proposed mitigation measures confirm the sites developability and are acceptable.

Alternative Option - Have doubts about site 6.16 Balmore Garden Nursery. Would like Site S222 included as a housing allocation.

Jigsaw Planning (Site S204 – East of Ferrymill Motors):

Are seeking a residential allocation on surplus land at Ferrymill Motors, Torrance.

We note that the site has been included as a 'preferred site subject to investigation for development' and therefore provide further information as follows. The site is deliverable and effective because:

- it is in full control of the Ferrymill Motors Limited and will be released during the plan period; the site is free from physical constraints;
- there are no contaminant issues regarding this land; In terms of marketability -
- the owners of the site are looking to relocate the existing business to a suitable alternative site. In the short term, subject to meeting all expectations in terms of technical assessments, the surplus

site (subject of this representation) can be delivered in the short to medium term. Interest has already been intimated from housebuilders.

- The landowner has confirmed that all utilities are available on site. Detailed review of access arrangements would be done in due course when a housebuilder is on board.
- Housing is the realistic alternative for the site given the site is located within the settlement boundary, within an established residential area. There is currently a good level of market demand for housing in Torrance.

Other further information in support of the site includes:

It will be possible to design the proposed housing site so that the housing could exist alongside the existing building, through layout of the housing, landscaping, acoustic barriers etc. Any floodlighting is positioned to prevent any loss of amenity to neighbouring properties and this could be adapted. In order to mitigate their noise level emissions, they no longer use an outdoor compressor /shotblaster. A residential development would not therefore have a detrimental effect on the day-to-day operation of this business or vice versa.

The proposed housing site would compliment the existing housing provision in the area and in particular could be designed to have an appropriate relationship with the new Dawn Homes housing to the north.

Ferrymill Motors are working with the Council to find a suitable alternative base for the business. They are currently looking at a few nearby alternatives. In the short term, the site subject of this representation is surplus to requirements and suitable for promotion as a housing site in its own right.

The site is sustainable for transport as there are two bus stops within a five minute walk.

The site is a brownfield infill site.

Montagu Evans (Site 6.16 Balmore Nursery): A layout comprising 9 units is being proposed, and these plans were submitted to EDC during the Call for Sites exercise. Pre-application discussions, with updated plans, have been undertaken. The site will be delivered in a single phase, and Adam Scotland are the preferred housebuilder and is committed to the delivery of the site. A planning application will be submitted in early course.

The site is considered to be viable and deliverable in terms of the Council's future housing strategy. It is acknowledged that there are possible flooding issues associated with the site, but all parties including the Council have acknowledged these are capable of being suitably mitigated. Discussions have been held with the Council and SEPA over issues relating to flooding, and Envirocentre have been appointed to deliver a solution.

Welcome the allocation of the site as part of the preferred option for Issue 28, but would request clarification on this policy to confirm this is indeed the case.

Does not support the alternative option, It is considered an unnecessary use of resources to reassess the site, given that Caledonian Properties and their consultants Envirocentre have been in discussion with EDC and SEPA in order to deliver a solution.

Caledonian Properties seek for the existing allocation to be carried forward into the emerging plan.

Montagu Evans (site S23 at Balmore Paddock)

The site S23 at Balmore Paddock, Balmore should be allocated for housing development in the emerging LDP. Caledonian Properties are not supportive of the Preferred Option or Reasonable Alternative Option in terms of 'Issue 28' of the MIR. Would look to progress proposals over the medium term, beyond the timescales for delivery of the Balmore Nursery site, and this would provide certainty in terms of a positive planning policy position and allow the development of the various surveys required to progress the site towards development.

The site assessment identified the site as unsuitable for development and responses to these reasons include:

A Flood Risk Assessment would be undertaken as part of any planning application, and suitable mitigation would be included in the masterplan for the site. It is acknowledged by SEPA and the Council that the adjacent site can be accommodated without any flood risk issues.

Once the nursery site is developed, the subject site at Balmore Paddock would be a natural extension to the settlement. Landscaping could also be provided around the edge of the site, a buffer which would enhance the character of Balmore as a rural village and provide a long term defensible and sustainable settlement boundary, with opportunities to improve the green network.

The site is serviced by a number of bus services which connect into nearby the settlement of Bishopbriggs and beyond to Glasgow. Bishopbriggs railway station is also within a 10 minute drive / bus journey of the site.

Bishopbriggs acts as a main commercial centre to the north of Glasgow, including a number of primary and secondary schools. It is within a 10 minute drive / bus journey of the site.

An archaeological evaluation of the site would be undertaken as part of any proposals on the site.

NHS Greater Glasgow & Clyde (NHSGGC) - NHSGGC do not have a specific view on the proposals within issue 28, however, we are aware of the need to review the potential need for additional health related facilities, if this issue is taken forward. NHSGGC continue to support the need to further and detailed engagement in relation to the potential impact both existing and new developments may have on the delivery of healthcare.

Scottish Water - Please note Water and Drainage Impact Assessments would be required for site S204. Due to the known flooding issues, it will be likely that a Drainage Impact Assessment will be required for the proposed alternative site.

SEPA - Again, we support the focus in the Preferred Option on brownfield and vacant land, provided, of course, that it is acceptable in the context of other policy drivers such as avoidance of flood risk.

We note in the "Reasonable Alternative Option" that to Site 6.16 Balmore Garden Nursery would be reassessed in terms of suitability: "Reason – Site has possible flooding issues it is considered capable of being suitably mitigated." It is not clear if Site 6.16 remains in the Preferred Option, but for the avoidance of doubt we stress the desirability of flood risk avoidance rather than flood risk mitigation as a long-term sustainable option. SEPA would be opposed in principle to a development which conflicts with flood risk policy as set out within Scottish Planning Policy.

SPT – Agree with the preferred option. Site is currently accessible by public transport and is connected to the existing village.

SNH - Agree with the preferred option

Torrance Housing for the Elderly Initiative - The proposal was started in 2010 into 2011 as a housing for the elderly initiative – to use the Council depot on school road and some of the adjacent garden, when surplus to requirements (now LDP housing allocation 6.22). Recently the community council agreed to take over the running of the project.

In 2015 we were informed from a private paper that it was acknowledged by the Council that there was local interest in housing for the elderly.

The proposal was supported by a circulation of every house in the village with an excellent response of over 200 residents including around 100 who confirmed an interest in actual occupancy of the facility.

The Council does not seem to be aware of the burden on the site relating to the Johnston family who granted the site to it.

In July 2018 met with the Housing Team and received a plan of the site for 13 units, this had no reference to sheltered housing and could include amenity and similar housing suitable for the elderly but without any special elderly facilities at the point of initial development. This is less helpful to elderly residents than we have been hoping for. Agreement regarding the garden area would be finalised in early 2019 and the actual development would commence in 2020.

The preferred use for the site should be sheltered housing for the elderly, in line with the Scottish Government's report of 2016.

Our current concerns are: Elderly friendly facilities such as walk in showers, lifts etc, A system that gives preference to Torrance residents, and how the Main Street development affects the project.

Planning Authority Response

The Proposed Plan has been prepared taking into account the responses received on the following issues.

Issue 28 – Where should new housing in Torrance and Baldernock be located?

In the main the responses supported the preferred approach. This includes support for brownfield development and comments that the option site S204 East of Ferrymill Motors and site 6.16 Balmore Nursery are effective and free from constraints. Other concerns were addressed about site specific issues, including traffic impact and amenity issues, at site S204. However it is considered that these can be addressed at planning application stage. Some support was expressed for the alternative option, which included reassessing the suitability of site 6.16, in particular due to flood risk. However the site agent will undertake a detailed appraisal of how flood risk can be addressed as part of a future planning application. It is therefore considered that the site can remain within the Plan and flood risk is best addressed at planning application stage, when further detailed information is available. Another comment on the type of housing at site 6.22 Kelvindale Nursery is already addressed by in the Plan, which identifies a key requirement that the preferred use for the site is to be sheltered housing or 100% affordable housing. The final type of housing will be decided at planning application stage, when details of the proposal will be available. Other housing sites suggested by landowners and developers are identified as unsuitable for development, and allocation.

Conclusion: Implement preferred option.

The Proposed Plan is subject to consultation, with all representations being considered by a Reporter on behalf of Scottish Ministers. This provides a final opportunity for comments.

Twechar

Community Area/Policy Theme	Twechar					
Elements of the engagement included:	<ul style="list-style-type: none"> Email responses 					
List of Organisation(s) commenting on this topic						
<ul style="list-style-type: none"> Barton Wilmore for Powertek Utilities Ltd Historic Scotland McEwan Hailey Planning & Development for James and Robert Rankin NHS Greater Glasgow & Clyde (NHSGGC) Scottish Environment Protection Agency (SEPA) Scottish Natural Heritage (SNH) Strathclyde Partnership for Transport (SPT) 						
Planning authority's summary of comments:						
<p><u>Issue 29 - What is the most appropriate way to ensure proposals for land use change or development in Twechar reflect the priorities identified in the Twechar Place Plan?</u></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;"><u>Preferred Option</u></th> <th style="text-align: center;"><u>Reasonable Alternative Option</u></th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1. Include the Place Plan priorities relevant to development and land use change in LDP2.</td> <td style="text-align: center;">2. Cross refer to the Place Plan on a case by case basis at planning application stage</td> </tr> </tbody> </table>			<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>	1. Include the Place Plan priorities relevant to development and land use change in LDP2.	2. Cross refer to the Place Plan on a case by case basis at planning application stage
<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>					
1. Include the Place Plan priorities relevant to development and land use change in LDP2.	2. Cross refer to the Place Plan on a case by case basis at planning application stage					
<p><i>Summary of comments from individuals</i></p> <p>None received</p> <p><i>Summary of responses from groups and organisations:</i></p> <p>SPT – Agree with the preferred option. To omit the place plan priorities within LDP2 would lessen their status.</p> <p><u>Issue 30 - Should the LDP continue to support the regeneration and repopulation of the village through the allocation of sites at MacDonald Crescent, Glen Shirva Rd and the Canalside?</u></p>						

Community Area/Policy Theme	Twechar
-----------------------------	---------

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Continue with existing LDP allocated sites at MacDonald Crescent, Glen Shirva Rd and the Canalside	2. Reevaluate deliverability of each site currently allocated in LDP.

Summary of comments from individuals

None received

Summary of responses from groups and organisations:

NHS Greater Glasgow & Clyde (NHSGGC) - NHSGGC do not have a specific view on the proposals within issue 30, however, we are aware of the need to review the potential need for additional health related facilities, if this issue is taken forward. NHSGGC continue to support the need to further and detailed engagement in relation to the potential impact both existing and new developments may have on the delivery of healthcare.

SEPA - We have no comment on this issue other than that it should be ensured that the sites allocated meet with other policies e.g. flood risk.

SPT – Agree with the preferred option. This approach supports the long terms regeneration and repopulation aspirations for the village and are well connected to the existing fabric of the village.

SNH - LDP 6.45: MacDonald Crescent: This site is contained within mature woodland. The woodland provides a strong landscape framework for housing. Should development of the site be progressed, development would need to ensure that it is integrated with the existing housing to the north and that links are created to the wider networks beyond.

Issue 31 – How can LDP 2 support and promote the local visitor economy in Twechar?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Provide criteria to encourage appropriate new visitor economy or tourism development, with specific focus on 'Tourism Asset Areas'.	2. Provide criteria to encourage appropriate new visitor economy or tourism development without specifying locations (Tourism Asset Area approach).

Summary of comments from individuals

None received

Summary of responses from groups and organisations:

Community Area/Policy Theme	Twechar
------------------------------------	----------------

Historic Scotland - We are content with the preferred option which suggests providing criteria to encourage appropriate new development with focus on Tourism Asset Areas (TAA). We note that for Twechar the Antonine Wall WHS is being considered as a TAA and as such consultation with HES regarding the proposed criteria will be required. We would also note that any such criteria will need to accord with the Antonine Wall Management Plan and the Supplementary Planning Guidance for the Antonine Wall. The Forth & Clyde Canal is also being considered as a TAA and again HES should be consulted regarding the criteria being proposed. The criteria should ensure that no significant adverse impacts to the site or setting of any of these assets are proposed by developments.

We also note that local people suggested that the mining heritage of the area should be celebrated, and you may wish to consider if there is scope to include this as part of the focus on local visitor economy and tourism development.

SPT – Agree with the preferred option. This encourages best use of the areas assets while seeking to manage and direct demand.

SNH - We support the principle of this approach. It will be important to ensure that criteria to promote the tourism/visitor economy, with specific focus on ‘Tourism Asset Areas’ provides for their understanding, protection and enhancement.

Issue 32 - Should Badenheath Business and Employment Site be retained in LDP2?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Deallocate Badenheath (S27, LDP 13.19) from LDP subject to discussion with the land owner regarding their work to bring forward the site for business uses.	Continue with existing allocation in LDP for a storage and distribution facility

Summary of comments from individuals

None received

Summary of responses from groups and organisations:

McEwan Hainey Planning & Development for James and Robert Rankin - With regard to the potential development of Badenheath, it has been demonstrated that the site is both marketable and effective (See section 3 above). We have current and active interest in the site from experienced and substantial companies, and are currently working with a particular developer who is taking the project forward with the aim of securing development on the ground. Against this very positive background, we do not support the Council’s preferred option. We do however support the Council’s “reasonable alternative option”. The latter will maintain the current allocation while providing continuity and confidence to the development industry to allow them to take their proposal forward. Should the site be deallocated, we believe this would be a

Community Area/Policy Theme	Twechar
<p>potentially critical change which would likely result in no development taking place and the loss of significant and substantial inward investment and employment opportunities to East Dunbartonshire.</p>	
<p><i>Comments on Monitoring Statement</i></p>	
<p>A number of observations are noted in the Council’s Monitoring Statement relating to Badenheath and in support of the Council’s preferred option 1 (see pages 261-262). However, from a development perspective, a number of these observations do not stand up to scrutiny or require to be clarified. For ease of reference these observations are noted below followed by our considered responses.</p>	
<p>Observation</p>	
<p>Option 1 – Deallocate Badenheath (Audit Site 32, LDP 13.19) from LDP subject to discussion with the land owner regarding their work to bring forward the site for business uses.</p>	
<p>Response</p>	
<p>My client would welcome further detailed discussions with the Council service departments to bring forward this strategically important site for development.</p>	
<p>Observation</p>	
<p>It is unclear that this site will come forward for business and employment uses and it may be more appropriate to deallocate the site at this time.</p>	
<p>The Business Land Review and Business Land Audit identifies that there is competition from other nearby areas and in addition it is a greenfield site without existing services.</p>	
<p>Response</p>	
<p>The development of such a larger site is a complex and costly exercise, which take significant amount of time and investment. To achieve development of the type and scale proposed, can take a considerable amount of time. This has been the case but this is not unusual. We would take issue with the statement that there is competition from other nearby areas, notably outwith East Dunbartonshire Council. Westfield and indeed other industrial areas do have units and land available. However, none of the sites or buildings are of a scale to accommodate a strategically important distribution centre. Badenheath has the capacity to accommodate such a development. Nor do these alternative sites have almost direct access onto the main motorway network.</p>	
<p>Observation</p>	
<p>Deallocation Badenheath from the LDP would reduce any potential opportunities for local employment and therefore there would not be an opportunity to provide benefits to Population and Human Health. However, this would also reduce the environmental impacts associated with the development of this site, resulting in no significant effects on the other environmental factors. In particular, it would protect this greenfield site but there would be a missed opportunity to remediate contaminated land.</p>	
<p>Response</p>	
<p>We agree that de-allocation would significantly reduce local employment opportunities. With regard to potential environmental impacts, as already identified in the existing allocation relating to Badenheath, these</p>	

Community Area/Policy Theme	Twechar
<p>environmental matters have been noted and any development must take cognisance of these constraints. By doing this, there would be no significant environmental impacts.</p>	
<p>Observation</p>	
<p>Choosing to deallocate this fairly remote site should encourage any employers looking for business land to locate in one of the sites which are closer to population centres. This will create employment in a more accessible location for those who do not have access to a car (for example, due to age, economic circumstances or disability).</p>	
<p>Response</p>	
<p>The suggestion that by de-allocating Badenheath employers looking for premises will be encouraged to locate in urban areas is missing the key point that the type and scale of development anticipated for Badenheath is such that there are no other sites even remotely of the scale and type located elsewhere in East Dunbartonshire.</p>	
<p>Observation</p>	
<p>If the site is de-allocated there may be a risk that, as a green-belt site, it attracts housing development. However this is extremely unlikely given the remote location of the site, which would make housing unsustainable, and proximity to incompatible land uses, including an industrial estate on the opposite side of the road and an abattoir nearby.</p>	
<p>Response</p>	
<p>The reference to housing in this case is not relevant. The landowner and interested party are focused on business and employment generating uses.</p>	
<p>Council's Option 2</p>	
<p>Observation</p>	
<p>The site was allocated in 2017 and therefore may require more time to be brought forward for development. The site is in a strategic location close to the M80. The site is located adjacent to an existing industrial area in North Lanarkshire.</p>	
<p>Response</p>	
<p>We would support this statement.</p>	
<p>Observation</p>	
<p>There are a number of environmental constraints associated with this site as detailed in the individual site assessment. As a result of these this option is likely to result in significant negative impacts to Population and Human Health, Biodiversity, Flora and Fauna, Landscape, Water Quality, Air Quality, Climatic Factors and Material Assets. However there would be the potential to remediate contaminated land and therefore present positive impacts to Soil and Geology.</p>	
<p>Response</p>	
<p>It is agreed that there are environmental issues to be considered as part of any development proposals. However, by careful planning and design, informed by a comprehensive suite of supporting reports and</p>	

Community Area/Policy Theme	Twechar
<p>assessments, any impacts can be mitigated against. As a consequence, we do not believe that, as a consequence of any future development, there will be significant environmental impacts.</p> <p>Observation If a suitable development proposal did come forward, then the site would provide employment opportunities. However, the location of the site means that these opportunities may not be accessible for everyone.</p> <p>Response This observation fails to take into account the public transport service which operates between East Dunbartonshire and Cumbernauld.</p> <p>Observation At around 52 acres, Badenheath is the largest site currently allocated for business land. Given that it is a site which is unlikely to come into use in the short to medium term, there is a risk that keeping its allocation will create the appearance of a business land surplus while not contributing anything to the supply of available land for business development.</p> <p>Response The areas noted in this observation are not correct. The site is significantly larger than 52 acres. It has been demonstrated that the site is marketable and effective, although its development will take time. Rather than giving a false impression of available land for business, retention of the allocation will provide both confidence to the development industry and an accurate amount of available land for business development.</p> <p>Observation Support the growth and diversification of businesses and attract employers to the local area the key priorities that have emerged through early stakeholder engagement, including encouragement of permanent jobs in the area.</p> <p>Response By maintaining Badenheath’s allocation the Council’s key aims of attracting employers to the local area will be supported.</p> <p>Observation Economy – targets key economic sectors and creates jobs that contribute to a sustainable and resilient economy this is an ambitious policy, which focuses on attracting investment rather than growing existing businesses.</p> <p>Response We believe the site is suitable for primarily a strategic distribution type development. This sector is not well represented in East Dunbartonshire and therefore, this type of development will help make the economy of East Dunbartonshire more resilient.</p> <p>Barton Wilmore for Powertek Utilities Ltd (Badenheath) - The location of the site represents one of the finest opportunities for a large-scale distribution park in Scotland given its excellent transport links following completion of the upgrade of the M80 motorway. However the site can also be delivered in a more flexible</p>	

Community Area/Policy Theme	Twechar
-----------------------------	---------

manner, based on an alternative configuration, to respond to prevailing market conditions. Maintaining the site’s allocation and supporting its delivery will help meet an identified need for such uses and will benefit the East Dunbartonshire economy, providing employment opportunities for residents which are currently not available. Powertek, who control the site, remain committed to delivering this site for the allocated use and as is set out within the supporting document. They are not aware of any technical reasons why the site will not come forward for development - the Council's stated concerns regarding landscape impact, flooding and biodiversity can all be addressed. Powertek have sought advice from market specialists in order to provide commentary on local market conditions (specifically in relation to business and industry uses) to provide guidance on the future direction of a revised masterplan for the site. As a result of this market analysis, two options have been investigated. One focusses on a large single user for the site, the other focussed on a series of smaller units which would be more attractive to light industrial users. This will offer flexibility on how the site comes forward for development within the lifetime of LDP2.

The fact that the site is deliverable and effective has already been proven through the Examination Report for the adopted LDP, which determined that the site was effective based on engineering information submitted at that time. The site has only been allocated since 2017 and a period of 2-3 years is simply not adequate to make a judgement as to whether the site is effective for its allocated use. In this regard, Powertek should be afforded more time to try and find an end user who will bring the site forward for development. It would be unreasonable for the Council to deallocate the site after such a short period of time.

The site is unique in that it offers potential to contribute to the severe shortage of large scale distribution sites remaining in prime location and as a result, it is considered that the site is of strategic importance to Scotland’s ability to satisfy large-scale buildings to support the country economic growth. Whilst detailed discussions would be required with the relevant departments of the Council and statutory consultees when the site progresses, we are of the view that there are no significant constraints which restrict the delivery of an appropriate development on this site in accordance with the allocation within the adopted LDP, which should be maintained into LDP2.

In terms of the Council’s specific concerns, the following comments are made:

Sustainability - While the site is highly accessible in terms of its location adjacent to the junction between the M80 and M73, it is also located close to large towns, railway stations and is connected by existing bus routes as well as Public Rights of Way and cycle routes. As such, the site at Badenheath can also be considered as a sustainable site as well as an accessible one.

Public Transport - Local centres and railway stations within a 10km radius are accessible from the site on public transport. While some routes require two buses, all end-to-end journey times range from 30-50 minutes and run with a frequency of every 30-60 minutes on week days. These include routes to local centres at Kilsyth, Kirkintilloch, Stepps and Cumbernauld and railway stations on the Argyle, Cumbernauld and Croy suburban lines and the Glasgow to Edinburgh via Falkirk national line, at Croy, Cumbernauld, Greenfaulds, Gartcosh, Stepps and Lenzie. Glasgow City Centre is directly accessible by bus with a 40 minute journey time and a frequency of every 30 minutes and Edinburgh is accessible in approximately 1 hour and 10 minutes by taking connecting buses to Croy and then the train.

Community Area/Policy Theme

Twechar

Walking and Cycling - In close proximity to the site there are a number of Public Rights of Way (PRoW) which provide walking and cycle routes to the closest residential areas such as Moodiesburn, Chryston and Cumbernauld (Condorrat, Croy, Greenfaulds and Balloch). However, these routes also connect to public transport by way of bus stops and railway stations.

Deliverability - can confirm that there is now clear interest from a national scale warehouse and distribution company who are looking to acquire the site for development of a large Class 6 (Storage & Distribution) use, which would cover c.30% of the site's developable area, with the remainder being used for Class 4 and 5 use. This interest is serious, to the extent that Powertek have had to sign a Non-Disclosure Agreement (NDA) as discussions progress, so therefore are unable to confirm who this prospective end user is.

The western areas of the site, which sit in the functional flood plain, are proposed for outdoor recreation use, and as shown on the masterplan, can be utilised for pathways, open space and outdoor circulation areas for use by employees.

Economic Impact - Construction Phase

- Direct construction jobs = 675
- Economic Output (Gross Value Added) generated by direct construction jobs = £44m
- Indirect/Induced construction jobs = 1,013
- Economic Output (GVA) generated by indirect/induced construction jobs = £95m
- Total Economic Output (over construction period) = £140m

Economic Impact - Completed Development

- Direct gross employment generated between 1,141 and 1,404 jobs
- Net additional employment generated between 708 and 899 jobs
- Net additional economic output of between £35m and £44m per annum

SNH – Agree in part. Deallocation from development, but have concern over the possible allocation to a different use e.g. residential. This is a very prominent site at the western edge of Cumbernauld on the EDC / NLC boundary. This green field site is physically and visually separate from other housing and associated amenities, with poor connectivity and will exacerbate ribbon development along the motorway corridor. The site also overlaps with at least one SINC site. Development is likely to compromise these designations.

If this site is allocated, we recommend appropriate developer requirements and outcomes are identified by the council and set out in the LDP. These might usefully include:

- Roadside screening to reduce visual prominence of site and potentially help with noise attenuation.
- Creation of a robust landscape framework with high quality functional open space.
- Retain and enhance existing mature trees/ hedges that contribute to landscape character and help create a setting for the proposed development.
- Keep taller building to the east of the track between Badenheath and Deerdykes.
- Take opportunity to enhance green network along the Luggie Burn.
- Active travel and recreation links, though this may be challenging in this relatively isolated context.
- Protection of the SINC designations.

We recommend that this site is not allocated for development.

Community Area/Policy Theme	Twechar
Planning Authority response	
<p>The Proposed Plan has been prepared taking into account the responses received on the following issues.</p> <p>Issue 29 - What is the most appropriate way to ensure proposals for land use change or development in Twechar reflect the priorities identified in the Twechar Place Plan?</p> <p>The Twechar Place Plan covers the period 2019 to 2024 and was approved at Council on 27 June 2019 and reported to the Community Planning Partnership Board on 10 October 2019, after public consultation. The Place Plan is a Locality Plan, produced under the Community Empowerment (Scotland) Act 2015. Scottish Planning Policy section on outcomes identifies that “At the strategic and local level, planning can make a very important contribution to the delivery of Single Outcome Agreements, through their shared focus on ‘place’. Effective integration between land use planning and community planning is crucial and development plans should reflect close working with Community Planning Partnerships”. Only Place Plan priorities which relate to land use change will be identified in the Plan. Relevant priorities in future Place Plans will be considered during the next review of the Local Development Plan.</p> <p><i>Conclusion: Implement preferred option</i></p> <p>Issue 30 - Should the LDP continue to support the regeneration and repopulation of the village through the allocation of sites at MacDonald Crescent, Glen Shirva Rd and the Canalside?</p> <p>It is noted that there were few responses to this issue. The preferred option was supported by SPT, while SNH indicated the sites could be supported subject to the protection of woodland, integration with existing housing areas and links to surrounding areas. The Council will ensure that these are reflected in the key requirements within the Community Policy section of the Proposed Plan.</p> <p><i>Conclusion: Implement preferred option</i></p> <p>Issue 31 – How can LDP 2 support and promote the local visitor economy in Twechar?</p> <p>The preferred option was largely endorsed, including support from Historic Scotland, SPT and SNH. The Council will consider relevant suggestions as part of the drafting of this policy, including alignment with the Antonine Wall Management Plan.</p> <p><i>Conclusion: Implement preferred option</i></p> <p>Issue 32 - Should Badenheath Business and Employment Site be retained in LDP2?</p> <p>Following discussions with the landowner since the MIR consultation ended, the Council is content to continue the current designation and include within the Proposed Plan. This will include a review of key requirements.</p> <p><i>Conclusion: Implement reasonable alternative option</i></p>	

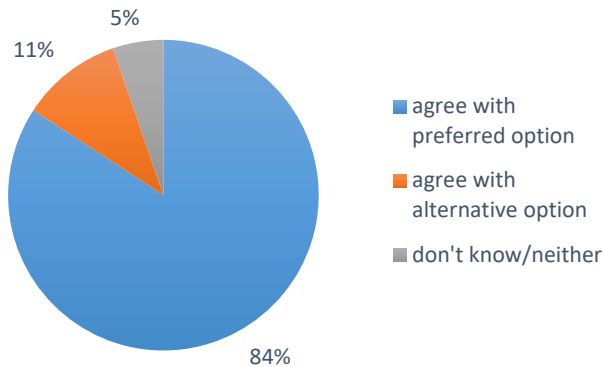
Community Area/Policy Theme	Twechar
<p>The Proposed Plan is subject to consultation with all representations being considered by a Reporter on behalf of Scottish Ministers, this provides a final opportunity for comments.</p>	

How can we address housing need in the right location?

Community Area/Policy Theme	How can we address housing need in the right location?
Elements of the engagement included:	<ul style="list-style-type: none"> • Questionnaire • Drop In Session • Email responses
List of Organisation(s) commenting on this topic	
<ul style="list-style-type: none"> • Barton Willmore c/o Cala Homes and Bellway Homes • Clarendon Planning for Barratt Homes • Dawn Homes Ltd • East Dunbartonshire Visually Impaired People's Forum • Geddes Consulting (various) • Gladman Developments Ltd (various) • Go Bike • Gray Planning for MacTaggart & Mickel Homes Ltd • Homes for Scotland • Icen Projects c/o Balfour Beatty Homes and Mactaggart & Mickel Homes • Icen Projects c/o Mactaggart & Mickel Homes • Jo Swinson (MP at time of consultation) • Keppie c/o Robertson Homes and Ashfield Land • Lichfields for Extralifestyle Ltd • Milngavie Community Council • Montagu Evans c/o Caledonian Properties & Mactaggart and Mickel Homes • National Federation of the Blind UK • Network Rail • NHS Greater Glasgow and Clyde (NHSGCC) • North Planning & Development c/o Scottish Water and Taylor Wimpey • Persimmon Homes • RFA Consultants • Ryden c/o Stewart Milne Homes • Scottish Environment Protection Agency (SEPA) • Scottish Natural Heritage (SNH) • Strathclyde Partnership for Transport (SPT) 	
Planning authority's summary of comments:	
<p><u>Do you agree with the preferred options for addressing housing need in the right locations (Issue's 33-37)?</u></p>	

Community Area/Policy Theme

How can we address housing need in the right location?



Agree with preferred option – 16
 Agree with alternative option – 2
 Other / Don't Know – 1

Issue 33 – How can new development ensure that the types and variety of new housing built in the area meets the broad needs of the community in a holistic manner?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Replace existing Diverse Communities section with detailed policy setting out how new development should contribute to meeting all housing needs through diversity, efficiency, adaptability and flexibility.	2. Retain existing wording in Diverse Communities section of Policy 6.

Summary of comments from individuals:

- Definitely agree with smaller housing.
- Agree with the inclusion of mixed housing types - previous developments were too focussed on top end single housing provision.
- A bad example of housing mix was the late switch from the flats to replace the old Bearsden Academy with even more large houses already being built on the Morven Road site.

Jo Swinson (MP at time of consultation) - When considering future planning applications, developers, the planning team and the Councillors must give due consideration to the following (see also Issue 36):

- The mix of housing being built. There should be a good mix of housing to properly meet the needs of the community, such as older residents looking to downsize, those with disabilities, first-time buyers and people on lower incomes:
 - East Dunbartonshire has a rising ageing population, but the vast majority of houses that have been built in recent years have been tailored to young families. The recent Main Issues Report

Community Area/Policy Theme	How can we address housing need in the right location?
	<p>did in fact show that the average household size is decreasing (2.36) so it seems reasonable to suggest that the future focus should not be placed on building 4–5-bedroom homes.</p> <ul style="list-style-type: none"> ○ By ensuring a good mix of housing in each development, you help to build a supportive community, which puts less pressure on limited local authority resources. <ul style="list-style-type: none"> ● The design and materials used to build new homes: <ul style="list-style-type: none"> ○ Heating accounts for a significant amount of our energy use at home. If we are to tackle the climate emergency, we need to be thinking about ways in which we can make new and existing homes more energy efficient. ● Tree planting and green spaces: <ul style="list-style-type: none"> ○ Replacing trees that are cut down to help absorb carbon, protect wildlife and improve health. ○ Where possible, ensure there are accessible green spaces. ● Transport: <ul style="list-style-type: none"> ○ Lessons need to be learned from Woodilee. The estate has bus stops but no bus service and Lenzie Station is harder to access for older people/those with disabilities. This means families are forced to drive, instead of using a more environmentally friendly mode of transport. ○ Sustainable transport links, including well-lit and well-maintained public footpaths and cycle paths, are essential for when considering any new development if we are to improve air quality across East Dunbartonshire. ● Previous planning consultations: <ul style="list-style-type: none"> ○ (For example) Morrisons’ proposed residential development on the old Bishopbriggs High School site received several comments from local people. When looking at releasing further land to increase an existing allocation where there may have been some local concern, previous comments on planning applications should be taken into consideration. <p><i>Summary of responses from groups and organisations:</i></p> <p>RFA Consultants (Boghead Rd) - New housing needs to meet the long-term needs of the community by providing a mix of development, types and tenures including market, affordable and special needs housing. In practical terms these types work in conjunction with each other on our proposals. Specific quotas across a range of house types can be derived from the HNDA and Local Housing Strategy. Furthermore, it is our view that there is a strong need for special needs and assisted living housing models in East Dunbartonshire. We believe that this evidence is backed up by the Monitoring Report. This issue relates to the setting out of a detailed policy which should outline how all new development should contribute to meeting all housing needs through diversity, efficiency, adaptability and flexibility. As previously noted, 91 new units would be proposed and these would include a mixture of both detached and semi-detached housing, 25% of which would be affordable homes. It can be concluded that the proposal would be compliant with ‘Policy 6: Creating Inclusive and Sustainable Communities’ as it states that East Dunbartonshire Council promotes diverse and inclusive communities and that to meet the housing needs of the wider community it will expect all developments to provide a range of housing types and sizes. It also states that 25% of any new housing development over 10 units should be affordable housing. The preferred alternative for Issue 33 allows a development such as the proposal for Boghead to be effectively delivered cross subsidising affordable and related community facilities.</p>

Community Area/Policy Theme	How can we address housing need in the right location?
	<p>Milngavie Community Council – Support preferred option. Housing should reflect needs of community in terms of sizes and types.</p> <p>Clarendon Planning & Development for Barratt Homes - The MIR Preferred Option is to set out detailed policy on how new development should contribute to meeting all housing needs in terms of diversity, efficiency, adaptability and flexibility. The aims and objectives are generally supported but Barratt Homes consider that the existing policy provisions set out within the MIR’s reasonable alternative option are sufficient and support this approach. The imposition of set quotas for different types of housing is deemed unnecessary when this is already addressed via affordable housing specialist needs delivery and building standards and wider market demand within the private sector.</p> <p>Lichfields for Extralifestyle Ltd</p> <p>SPP requires that planning authorities meet the housing land requirement in full, across all tenures (Paragraph 110). It also confirms (Paragraph 122) that LDPs “should allocate appropriate sites to support the creation of sustainable mixed communities and successful places and help to ensure the continued delivery of new housing”.</p> <p>SPP identifies types of affordable housing which can be in the form of social rented accommodation, mid-market rented accommodation, shared ownership housing, shared equity housing, housing sold at a discount (including plots for self-build), and low cost housing without subsidy (Paragraph 126). It also identifies (Paragraph 130) a requirement to consider the need for specialist provision that covers accessible and adapted housing, wheelchair housing and supported accommodation, including care homes and sheltered housing, as well as housing for Gypsy/Travellers and Travelling Showpeople (Paragraph 133) and need for housing in multiple occupation (Paragraph 134).</p> <p>Clydeplan, in its Placemaking Principle (Table 1) “supports a mixture of housing types which are well designed and energy efficient and that meet the needs of a variety of households.” (Lichfields emphasis).</p> <p>With the exception of resource efficiency which runs throughout all strands of planning policy, neither of these publications specify that all new development should contribute to meeting these multiple housing objectives. Wording a new policy which requires that each of these types and tenures to be addressed, including quotas as suggested by the MIR runs the risk of certain developments being unimplementable in the form sought.</p> <p>For example, there are few individual developers that can deliver such a range on a small to medium site. Only on large-scale settlement expansion or new communities could all the types and tenures referenced be accommodated. A mix including even three different types described in the MIR could require multiple developers and subdivision of sites that may render them unimplementable. Smaller sites in single ownership are only likely to deliver a certain range and choice dependent on the given developer and the product in which they specialise.</p> <p>Adaptable and accessible homes have high space standards which can either result in a higher land take and therefore lower density, or can result in room sizes being compromised thereby affecting overall quality. Unless a developer’s model is already established to work to those standards and the land purchased at a price which reflects these requirements.</p>

Community Area/Policy Theme	How can we address housing need in the right location?
<p>To mitigate the potential constraints arising from provision of such a wide range of housing, it would be preferable to include positive policy incentives whereby provision of specialist or more marginal housing types will be encouraged and would pose favourably in planning balance when assessing the acceptability of a development.</p> <p>Montagu Evans c/o Caledonian Properties & Mactaggart and Mickel Homes – Support the alternative option as this focuses on a flexible approach promoting inclusive communities and lifetime homes which consider future adaptability. The preferred option, which includes the introduction of quotas, may impact the viability and deliverability of future sites and could delay delivery of mainstream housing.</p> <p>Persimmon Homes - The preferred option seeks to impose prescriptive quotas or standards on new housing developments. Within East Dunbartonshire the private house builders already deliver 25% affordable homes and a further 15% unsubsidised affordable homes. Further restrictions on the type or potential number of private homes (that fund a share of affordable homes across East Dunbartonshire) will make sites less viable and reduce investment by private house builders in East Dunbartonshire.</p> <p>In addition to the above the current building regulations already set housing standards and allow for future adaptations within homes to accommodate an older, potentially less mobile, occupant. Should quotes require stairless properties they are more land hungry and less efficient. As a result the business case for the development is compromised.</p> <p>Homes for Scotland - Support the Reasonable Alternative Option, which can be flexibly and positively applied to particular circumstances, and which already focusses on adaptability, the provision of lifetime homes and different tenures.</p> <p>The Preferred Option would result in more prescriptive requirements than the current LDP policy. Homes for Scotland would caution strongly against a rigid policy involving, for example, firm quotas. To apply quotas, especially in respect of private sector supply would be a blunt tool and unlikely to reflect actual demand. Our members are adept in understanding market demand in different localities. It would distort the market to apply fixed quotas and could delay the delivery of mainstream housing. As regards housing standards, these are already imposed by the building regulations, which also address the concept of lifetime homes. It is complicating and unnecessary for additional standards to be imposed through the planning policy.</p> <p>The Preferred Option suggest that there may be a policy requirement for more stairless homes. Such an approach needs to be considered against the fact that bungalows are comparatively land hungry and therefore more expensive to build. The knock-on impact on viability reduces scope for achieving other policy objectives.</p> <p>NHS Greater Glasgow and Clyde (NHSGCC) – Support preferred option. It is our view that new development should harness and improve the health and wellbeing of the community, both existing and new.</p> <p>Barton Willmore c/o Cala Homes - CALA are of the view that flexibility is key and that there should be a recognition of the market drivers that guide housing development. Housebuilders will only build homes that they know they will be able to sell. This is guided by detailed market research carried out on a local</p>	

Community Area/Policy Theme	How can we address housing need in the right location?				
<p>level, consider many statistics that guide what types of properties are required by the people who live, and want to live in these areas</p> <p>SPT – Agree with the preferred option. The approach set out in relation to these issues will ensure the delivery of the range of housing that is required to meet the area’s needs.</p> <p>Barton Willmore, for Bellway Homes –Given the nature of the planning and development system, and the fact that the housing market is driven significantly by market forces, Bellway are advocates for flexibility wherever possible in planning documentation.</p> <p>With this in mind, Bellway are generally supportive of the Council’s preferred approach to Issue 33. Variety is extremely important in housebuilding, ensuring that there is a product to meet the needs of as many customers as possible, addressing a broad spectrum of housing requirements. Bellway recognise this and embrace it throughout their developments across the country.</p> <p>Notwithstanding this, the terminology presented appears to indicate that the proposed policy has the potential to be overly prescriptive. There has to be recognition within the policy, that the market drives the housebuilding industry and that prescriptive policies can only prove to slow up the development process.</p> <p>Notwithstanding the above, Bellway support the general approach of the Council to seek increased variety that meets the needs of the community, subject to the detailed wording that comes forward in the Proposed Plan.</p> <p>Iceni Projects (For Balfour Beatty Homes and Mactaggart & Mickel Homes) - Agree with the reasonable alternative approach. This needs to be flexibly and positively applied to particular circumstances, which already focusses on adaptability, the provision of lifetime homes and different tenures. It is important that all new housing developments can contribute to a diverse range of house types and tenures, including alternative forms of affordable housing delivery. This will clearly be dependent on the size, location and form of development being proposed – however this should only be encouraged where appropriate and viable / deliverable. There should be no rigid policy quota included within LDP2 this will have to be very sensitively managed to ensure it does not delay or impede development of a site where requirements are not suitable for particular locations, etc. It is the strategy for the promotion site to provide smaller homes to accommodate down sizers, retirement living and more affordable family housing for sale to meet demand and tackle the ageing population issues and declining school rolls in the area.</p> <p><u>Issue 34 – Does the Housing Land Requirement in the approved SDP and LHS require amending for LDP2?</u></p>					
<table border="1"> <thead> <tr> <th data-bbox="199 1783 772 1823"><u>Preferred Option</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="199 1823 772 2047"> <p>1. Maintain a Housing Supply Target based on Clydeplan Strategic Development Plan 2 and the Local Housing Strategy 2017 plus utilisation of appropriate brownfield land.</p> </td> </tr> </tbody> </table>	<u>Preferred Option</u>	<p>1. Maintain a Housing Supply Target based on Clydeplan Strategic Development Plan 2 and the Local Housing Strategy 2017 plus utilisation of appropriate brownfield land.</p>	<table border="1"> <thead> <tr> <th data-bbox="785 1783 1359 1823"><u>Reasonable Alternative Option</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="785 1823 1359 2047"> <p>2. Adjust the target taking a placemaking led approach based on recent affordable housing completion rates.</p> </td> </tr> </tbody> </table>	<u>Reasonable Alternative Option</u>	<p>2. Adjust the target taking a placemaking led approach based on recent affordable housing completion rates.</p>
<u>Preferred Option</u>					
<p>1. Maintain a Housing Supply Target based on Clydeplan Strategic Development Plan 2 and the Local Housing Strategy 2017 plus utilisation of appropriate brownfield land.</p>					
<u>Reasonable Alternative Option</u>					
<p>2. Adjust the target taking a placemaking led approach based on recent affordable housing completion rates.</p>					

Community Area/Policy Theme	How can we address housing need in the right location?
	<p>3. Adjust the target to accommodate further significant growth and sustain the current delivery rates.</p>

Summary of comments from individuals:

Greenbelt must be protected and equalities are considered

- It is important that greenfield sites and the greenbelt is protected in all plans
- Any new housing allowed should be affordable
- New housing should improve infrastructure but retain greenbelt

Summary of responses from groups and organisations:

Neil Gray (For Mactaggart and Mickel – Meadowburn Ave Lenzie) - We note the Council's preferred MIR option for housing land requirement is to maintain a Housing Supply Target based on Clydeplan Strategic Development Plan 2 and the Local Housing Strategy 2017 plus utilisation of appropriate brownfield land. We note EDC's reason for this is the option meets the Housing Supply Target set out in the Clydeplan Strategic Development Plan 2 and the Local Housing Strategy 2017. EDC also states how that option allocates additional brownfield sites for housing in order to regenerate the area's brownfield land and provide a longer-term housing programme to facilitate the development of affordable housing in the area by the Council's Housing Service. Whilst the Council's preference is supported, we do not consider it will be enough to make a real and positive impact on future housing and wider social needs highlighted in the MIR and which are high on the agenda – ageing populations, climate change and private sector investment for infrastructure and other essential needs. We believe the Council's preferred option would only really make the minimum impact. We do not foresee how the Council's preferred option would allow continuing levels of private development, as demand for private homes in East Dunbartonshire needs continue. Whilst we appreciate the city region strategy of prioritising the regeneration of brownfield land and limiting urban sprawl is important, some limited release of greenfield land will be necessary so that a more diverse range of housing types (including for the elderly or special needs) can be provided.

RFA Consultants (Boghead Rd) - Scottish Planning Policy requires planning authorities to allocate a generous supply of land for housebuilding. Furthermore, planning authorities need to maintain a 5-year supply of housing land at all times in accordance with LDP Policy 6.

The SDP requires that local development plans (LDPs) should allocate land on a range of sites which is effective or capable of becoming effective to meet the housing land requirement up to year 10 from the predicted year of adoption, ensuring a minimum of five years effective land supply at all times. The proposed development site provides a placemaking opportunity to contribute to maintaining this target. In relation to Issue 34 our client would wish to see adjustment to land supply targets to enable significant growth in accordance with Clyde Plan 2 Targets and the Local Housing Strategy. Indeed, it is acknowledged that 'This option goes beyond the requirements in the SDP and LHS in order to focus on how new housing can contribute locally to outcomes such as improving affordability, addressing demographic change and the long-term provision of services. It also 'Provides opportunities to provide a more diverse range of housing types including potential housing for older people. This issue should be considered in conjunction with issue 35'.

Community Area/Policy Theme	How can we address housing need in the right location?
<p>In addition, this approach would “allow continuing levels of private development, the Report of Consultation notes that some respondents to the early engagement stated that demand for private homes in East Dunbartonshire should continue to be met. We do not accept that this would be contrary to the spatial strategy and that greenfield release should be re-assessed. In terms of the housing land supply options we would support Option 3 which identifies a Housing Supply Target of 6,693 homes. A significant proportion of this will be elderly and specialist households. Unless allocations in LDP are increased the Council faces a deficit of 1,811 units (minimum) on the assumption that the Draft 2019 HLA is accurate.</p> <p>This submission provides evidence which demonstrates there is a substantial need and demand for new homes within East Dunbartonshire. Allocating sufficient land to meet the needs of a growing population and to address growing affordability pressures should be a key priority for the emerging LDP. Doing so will yield important additional economic benefits. Homebuilding creates new jobs, new customers to enhance the viability of existing businesses and delivers significant fiscal benefits to the Council and Scottish Government.</p> <p>East Dunbartonshire recorded 2,168 completions between 2012-17 or an average of 361 dwellings per annum. Scottish Government figures show 331 completions in 2017-18. Looking ahead the agreed 2018 housing land audit programmes an average of 468 completions until 2022-23. However, thereafter no more completions are anticipated, as the only remaining sites are constrained with a total capacity of only 400 dwellings.</p> <p>Boghead can assist in making up this shortfall as well as improving choice of house types and tenures. The site is a sustainable location in respect of SPP Sustainability Criteria (Para 29) and meets the Effectiveness Criteria in PAN 2/2010. It brings with it significant socio-economic and community benefits. In terms of the Preferred alternative within the MIR we are concerned that allocating from the preferred housing package of sites (Issue 34) will not meet requirements of Scottish Planning Policy or Clyde Plan. Furthermore, we do not agree that this approach will facilitate re-generation, protection of the greenfield land or allow a diverse range of sites / housing types to come forward during the plan period. We support the Reasonable Alternative Approach although we note that Boghead is not included. Boghead is a sustainable location where environmental impact can be mitigated and managed. We also note that the Open Space and Asset Management reviews are being undertaken by the Council and may influence the policy stance taken.</p> <p>‘Policy 6: Creating Inclusive and Sustainable Communities’ states that East Dunbartonshire Council will support proposals for sheltered housing, care homes and other forms of assisted living and that they will particularly support such developments where they are proposed to integrate with other forms of new housing, and/or where they will integrate well with existing communities. The proposal will clearly be supported by this policy due to its integration of a care home, assisted living accommodation, affordable housing, higher value housing and sports/community facilities.</p> <p>New housing can be located at Boghead, Lenzie as a preferred alternative. Such a development would be in accordance with Scottish Planning Policy in terms of maintaining a generous supply of land for housing and a 5-year land supply at all times. This requirement is reflected in the approved Glasgow and the Clyde Valley Strategic Development Plan (SDP).</p> <p>We have assessed the sites excluded by the Monitoring Report and object to the matter that Boghead is not included. The proposed development would meet local development objectives and provide a range</p>	

Community Area/Policy Theme	How can we address housing need in the right location?
<p>of community benefits. It can be concluded that the site at Boghead, Lenzie should be considered for allocation.</p> <p>We welcome the opportunity to put forward our comments at the early stage of the plan-making process. We consider that the evidence in this submission clearly demonstrates the importance ensuring sufficient land supply is made available to allow an increased rate of home building to be realised. To ensure that need and demand is met, and that affordability pressure can be addressed there is an urgent need for the allocation of new effective sites for suitable for new homes.</p> <p>Geddes Consulting (various) – Support Alternative Option 3. The Main Issues Report (MIR) sets out three Options for the East Dunbartonshire Local Development Plan (LDP) 2. Any Option is required to accord with the approved Clydeplan Strategic Development Plan (SDP). In reaching conclusions for the Clydeplan Examination on Issue 10 Selection of Growth Scenario, the Reporter concluded that:</p> <p>“Policy 8 would clearly require (in particular if modified in accordance with my recommendations below) sufficient land to be identified at both housing sub-market area and local authority geographies, providing a degree of safeguard against shortages arising”.</p> <p>And the authority acknowledged in the hearing that a shortfall in the supply in a housing sub-market area could potentially be addressed by development anywhere within it, even if within a different local authority area. Similarly, a shortfall in the supply in a local authority area could be addressed anywhere within that local authority, even if in a different housing sub-market area (Issue 10, paragraph 30). In approving the modifications to Clydeplan SDP, it is the expectation of Scottish Ministers that each constituent local authority should make provisions to meet the housing land requirement on the following basis:</p> <ul style="list-style-type: none"> • all tenure by local authority area (Schedule 8); and • private sector by local authority area (Schedule 10); and • private sector by housing sub-market area (Schedule 9). <p>Policy 8 is also clear the constituent local authority should allocate a range of sites which are effective or expected to become effective in both plan periods of the housing land requirement, 2012 to 2024 and 2024 to 2029, by each housing sub-market area and each local authority area.</p> <p>The approved SDP identifies that the constituent local authorities should: ...allocate a range of sites which are effective or expected to become effective in the plan periods to meet the Housing Land Requirement, for each Housing Sub-Market Area and for each Local Authority, of the SDP up to year 10 from the expected year of adoption.</p> <p>With consultation beginning in 2020 (2020/21) at the earliest, the Proposed LDP 2 will not be adopted by the Council until 2022 (2021/22) at the earliest. In accord with Policy 8, the housing land requirement to 2032 (2031/32) therefore needs to be identified. West Dunbartonshire Council is a constituent authority of Clydeplan. It has established through its submission of the Proposed LDP to Examination that this additional housing land requirement is calculated by dividing the total housing supply target, over both periods of the LDP, by the 17 year development plan period to establish an annual average housing supply target. This annual average housing supply target is then multiplied by the number of years required and the 15% generosity allowance is added to this housing supply target.</p>	

Community Area/Policy Theme	How can we address housing need in the right location?
------------------------------------	---

The Local Housing Strategy (LHS) 2017 -2022 identifies that the housing supply target set out in Clydeplan has been adjusted to further increase delivery of affordable housing across East Dunbartonshire. The difference between the all tenure Clydeplan housing supply target and LHS housing supply target is 1,460 homes. The difference between the private sector Clydeplan housing supply target and LHS housing supply target is 790 homes. Accordingly, the scale of upwards adjustment needs to be added to the Clydeplan housing land requirement.

As defined in the Preferred Option, taking account of the Local Housing Strategy increases to 2024, the Proposed LDP 2 must be able to identify how the following housing land requirement will be met as a minimum:

Area	2012 to 2024	2024 to 2029	2029 to 2032
All Tenure by Local Authority Area	4,030 (2,570 HLR + 1,460 LHS)	30	460
Private Sector by Local Authority Area	2,640 (1,850 HLR + 790 LHS)	30	330
Private Sector by Greater Glasgow North West Housing Sub Market Area	7,875 (7,430 HLR + 445 LHS)	3,670	1,959
Private Sector by Strathkelvin and Glasgow North East Housing Sub Market Area	3,745 (3,300 HLR + 445 LHS)	1,040	766

The housing land requirements set out in Clydeplan were based on evidence set out in the 2012-based Principle Household Projections. At this point in time, household growth was projected from 2012 to 2029 to be an estimated 1,220 new homes with an existing need of circa 900 homes as set out in the Overcrowded and Concealed Household Estimates 2013-2015. This equates to housing need and demand / housing supply target of 2,120 homes and a housing land requirement of 2,438 homes from 2012 to 2029 and is in line with the Clydeplan all tenure housing land requirement for East Dunbartonshire. However, the latest 2016-based Principle Household Projections illustrate a different set of circumstances. Household growth is projected from 2016 to 2032 to be an estimated 4,181 new homes. Taking account of the existing need of circa 900 homes this equates to housing need and demand / housing supply target of 5,081 homes and housing land requirement of 5,843 homes (15% generosity).

This estimate of existing need does not take into account homelessness which is currently 421 applications in 2018/19 in East Dunbartonshire according to Scottish Government. It is clear that the only Option presented in the Main Issues Report that would seek to address this significant shift in household growth for East Dunbartonshire would be Alternative Option 3, however this would require adjustment. According to the MIR Monitoring Statement, the number of homes completed in the East Dunbartonshire local authority area over the period 2016/17 to 2018/19 are as follows:

Tenure	16/17	17/18	18/19	Total
Private	284	211	217	712
Social	55	36	31	122
All Tenure	339	247	248	834

According to the Monitoring Statement, 834 all tenure homes were completed across the East Dunbartonshire local authority area between 2016/17 and 2018/19. This included 712 private sector homes.

The housing land supply for East Dunbartonshire is set out in the Draft Housing Land Audit 2019 (Appendix 4). The Monitoring Statement confirms that between 2019 and 2026, the effective housing land supply will deliver 1,964 homes. There remain only another 376 homes to be built in the established land supply beyond 2026. Of these 376 homes, no further homes are expected to contribute in the period from 2026 to 2032 as all are non-effective in 2025/26.

Community Area/Policy Theme	How can we address housing need in the right location?
------------------------------------	---

In essence, the Monitoring Statement confirms that the established housing land supply for East Dunbartonshire ends in 2026. No more housing will be delivered beyond 2026. This is an unacceptable position for the development strategy of the Proposed LDP 2. Based on the evidence set out in the 2016-based Household Projections, taking account of the all tenure housing completions to date and the all tenure housing land supply, the outcome of the all tenure by East Dunbartonshire local authority area assessment is as follows:

	2016 to 2032	
Housing Supply Target	5,081	
Generosity (15%)	762	plus
Housing Land Requirement	5,843	equals
Completions (2016 to 2019)	834	minus
Established Housing Land Supply (2019 to 2032)	1,964	minus
Surplus or Shortfall	-3,045	equals

According to the latest data, the development strategy is currently 3,045 homes short of meeting existing and future housing need and demand / housing supply target in East Dunbartonshire. It is recommended that this calculation is adopted for the Proposed LDP 2. Taking account of the Preferred and Alternative housing allocations of 732 homes, there would be an outstanding shortfall of 2,313 homes to meet through further housing allocations.

If this is not appropriate, the only Option presented in the MIR that would seek to address this unmet housing need and demand is Alternative Option 3. This identifies a housing supply target of 6,693 homes from 2012 to 2032 and housing land requirement of 4,947 homes from 2019 to 2032. This requires an additional 1,811 homes to be allocated. Based on the evidence set out in the Monitoring Statement, taking account of the all tenure housing land supply, the outcome of the all tenure by East Dunbartonshire local authority area assessment is as follows:

	2012 to 2032	
Housing Land Requirement	7,483 (HLR 3,060 + 4,423 EFA)	equals
Completions (2012 to 2019)	2,391	minus
Housing Land Requirement (2019 to 2032)	5,092	
Established Housing Land Supply (2019 to 2032)	1,964	minus
Surplus or Shortfall	-3,128	equals

According to the Monitoring Statement, the development strategy is currently 3,128 homes short of meeting existing and future housing need and demand / housing land requirement in East Dunbartonshire. It is recommended that this calculation is adopted for the Proposed LDP 2.

Taking account of the Preferred and Alternative housing allocations of 732 homes, there would be an outstanding shortfall of 2,396 homes to meet through further housing allocations. The proposed amendment based on the 2016-Household Projections and Alternative Option 3 are in broad alignment, with similar shortfalls. No other Option (Preferred Option or Alternative Option 2) presented in the MIR addresses the existing need and future demand in East Dunbartonshire. Accordingly, Alternative Option 3 should be adopted for Proposed LDP 2.

Community Area/Policy Theme	How can we address housing need in the right location?
<p>Gladman Developments - Homes for Scotland has submitted a representation to the Council’s Main Issues Report addressing this question and the wider issue of housing land supply. As a full member of Homes for Scotland, we endorse the position they have presented, and these should also be considered to reflect Gladman’s views on the issue. The figures we have noted below have been identified and evidenced by Homes for Scotland and have therefore been used to support our further commentary on the issue below. We also reserve the right to make any further comments on the issue as the Council progress towards a Proposed Plan and later, submission for Examination.</p> <p>We do not support the Council’s Preferred Option 1 or Alternative Option 2 approach towards the Council’s housing land supply and setting a housing land requirement. Although it is acknowledged that the Council’s preferred option 1 is based on the SDP, Clydeplan, there are a number of additional factors that must be accounted for when setting the housing land requirement within the LDP2.</p> <p>Firstly, Clydeplan was published in 2017, where housing targets were informed by 2012-based household projections. However, the most recent household projections from the National Records of Scotland (2016 based) are significantly different to the 2012 projections. The Housing Supply Target (HST) for East Dunbartonshire from 2012-2029, identified in Clydeplan, is 2,260 units (from 2024-2029 the HST is only 20 units). The 2016-based projections show an increase of 5,464 households over the same period. Please refer to the Homes for Scotland representation for more information.</p> <p>This is the most up-to-date evidence available and clearly demonstrates that there is a housing need and demand that the current Clydeplan Housing Supply Target for East Dunbartonshire, will not meet. The Council must therefore recognise this updated evidence base and address the housing need and demand when setting the Housing Supply Target and Housing Land Requirement within LDP2 for the period 2012-2032. The Council’s Preferred Option 1 does not achieve this and should therefore be disregarded when preparing the Proposed Plan. Of the Options presented within the MIR, Alternative Option 3 is the only option that would meet the housing need and demand within East Dunbartonshire.</p> <p>We also note our concern in relation to there being no reference within the MIR to the Clydeplan Housing Sub-Market Areas that East Dunbartonshire is part of. Policy 8 of Clydeplan requires that Local Development Plans make provisions to meet the Housing Land Requirements (HLR) at Local Authority level (All-tenure and Private) and by Housing Sub-Market Area (HSMA) in accordance with Schedules 8, 9 and 10. East Dunbartonshire forms part of two HSMA within the Clydeplan region: the Strathkelvin and Glasgow North East (SGNE) HSMA; and the Greater Glasgow North and West (GGNW) HSMA. Clydeplan sets an HLR for these HSMA, which East Dunbartonshire must contribute towards. In review of the latest Housing Land Audit of the relevant authorities within these HSMA, it is evident that there is a substantial shortfall in the GGNW HSMA over the plan period. We refer to the Homes for Scotland representation on this issue that sets out the detailed calculations of this shortfall and further information as to how this shortfall has been identified.</p> <p>As these calculations demonstrate, even with the inclusion of the proposed housing allocations from the Council’s MIR Preferred Option 1, there remains a shortfall of 2,680 homes over the 2012-2032 period. Exacerbating the issue, the latest East Dunbartonshire Housing Land Audit (2018) shows that there is a serious lack of supply programmed for delivery 2023 onwards (2023/24 – 56 units; 2024/25 – 15 units), which will only intensify the shortfall. It is also important to highlight that from each of the Council’s Preferred housing allocations in the MIR, there is only one site (MIR Site Ref: S312 Westerhill, Bishopbriggs) where there is a recognised housebuilder or promoter attached to the site (Taylor Wimpey).</p>	

Community Area/Policy Theme	How can we address housing need in the right location?
<p>This raises serious questions on the effectiveness of the remaining 22 preferred allocations, particularly in terms of the ability to deliver within the LDP2 plan period.</p> <p>The Council are therefore required to allocate additional sites for housing within East Dunbartonshire, and particularly within the Greater Glasgow North West HSMA to make an appropriate contribution to this shortfall.</p> <p>In light of the above, we largely agree that the approach outlined within Alternative Option 3 and consider this the most appropriate option to be adopted by the Council in setting the Housing Land Requirement for the next plan period. To meet this requirement, additional sites will need to be identified for housing throughout East Dunbartonshire and particularly the GGNW HSMA to address an existing substantial shortfall. The sites we are promoting at Prestonfield, Milngavie (S300) and Stockiemuir Road, Bearsden (S301) are both effective and could make an immediate contribution to a substantial shortfall in the GGNW HSMA, while the site at Blacklands Place, Lenzie (S181) can contribute to the local authority requirement.</p> <p>The Council has stated reasons how Alternative Option 3 would be contrary to the National Planning Framework and Scottish Planning Policy (SPP). We strongly disagree with this assertion, however. SPP requires that the planning system should identify a generous supply of land for each housing market area to support the achievement of the housing land requirement across all tenures". Alternative Option 3 is the only option that will address both the shortfall in the relevant housing market area, as well as meeting the housing need and demand based on the most up-to-date evidence in the 2016-based household projections.</p> <p>Moreover, 2.10 of NPF3 states that "flexibility is required for different approaches to housing provision that respond to varying local requirements". There is a clear need to accommodate population growth in East Dunbartonshire and Alternative Option 3 must be adopted to achieve this. This option is therefore not contrary to SPP and NPF3 and is indeed supported by national planning policy. The allocation of suitable and sustainable greenfield/green belt sites should be considered both acceptable and a necessity by the Council.</p> <p>We also note that the Council claim the release of greenfield/greenbelt sites would compromise the broader city region strategy, identified within Clydeplan. Once again, we do not agree with this assertion, as although the regeneration of brownfield land is prioritised, this clearly does not preclude consideration of greenfield sites. Indeed, Clydeplan recognises the role greenfield sites have in the delivery of new homes (Clydeplan 6.25). Furthermore, Clydeplan Policy 8 also supports the delivery of housing on greenfield sites when steps must be taken where a shortfall in the five-year housing land supply arises. The Council's reasons for disregarding Alternative Option 3 are therefore flawed. In consideration of the above, Option 3 is the most appropriate option identified within MIR Issue 34 and the only solution that will meet existing housing need and the substantial shortfall within the GGNW Housing Sub-Market Area. The Housing Supply Target should therefore be set at 6,693 homes for the period 2012-2032.</p> <p>Ryden c/o Stewart Milne Homes - Disagree with preferred option. The identification and allocation of new sites for development beyond 2023 is urgent for a number of reasons, including:</p> <ul style="list-style-type: none"> • The demographic and affordability factors in the area (are particular relevance to Bearsden where no new significant sites are anticipated in the MIR); and 	

Community Area/Policy Theme	How can we address housing need in the right location?
<ul style="list-style-type: none"> • The necessity of homebuilders planning site preparation and the delivery of new housing over a 3 to 5-year period. <p>Without the allocation of new sites, there will be no allocated sites capable of delivery beyond 2023. It is submitted that allocating the land at Langfaulds, Bearsden (the site) would assist EDC in meeting this challenge.</p> <p>Keppie c/o Robertson Homes - do not agree with the Preferred Option. Suggest progressing with Reasonable Alternative 3 of 'Table 1: Housing Land Options Summary – All Tenure'; adjusting the target to accommodate significant growth. It is clear that the Council should be providing a generous supply of new housing, maintaining a 5-year supply at all times, and enabling land in a range of locations. It seems that housing supply will fall away abruptly nearing the end of the LDP2 period, with only 44 units programmed for delivery in 2025/26, compared with 473 units programmed in 2021/22. The HLA 2019 identifies only 9 sites, which will deliver housing units in Bearsden during the period 2019/20 to 2025/26. It is also noted that, following the delivery of 179 units over 2019/20 and 2020/21, 2021/22 delivers only 28 units from only 3 sites, 2022/23 delivers only 22 units from two sites and 2023/24 delivers only 25 units over one site. There are no sites identified in the audit programming to deliver any units in 2024/25 or 2025/26. This does not represent a “generous supply” or a “range” of housing land, or indeed an ongoing 5-year supply in Bearsden.</p> <p>Milngavie Community Council – Agree with preferred option</p> <p>Clarendon Planning & Development for Barratt Homes (Saddlers Brae) - The MIR must address the period to 2032, being the period ten years following expected LDP adoption. Clydeplan sets an all-tenure Housing Supply Target (“HST”) for East Dunbartonshire of 2,240 units between 2012-24 and a further 20 units between 2024-29.</p> <p>MIR Preferred Option 1 - Table 1 of the MIR sets an HST of 3,732 homes. This is evidenced in the MIR Monitoring Statement which sets out that the Local Housing Strategy (to enable greater delivery of affordable housing to meet national targets) has adjusted the Clydeplan HST for the initial 2012-24 period from 2,240 units to 3,700 units (an increase of 1,460 units). The MIR has also rolled forward the 2024-29 period to 2032 (an additional 12 units) which provides for a total HST of 32 units for the period 2025-32. The MIR calculates the Housing Land Requirement (“HLR”) by deducting completions in the period to date and then adding a 15% generosity allowance (3,732 - 2,391 completions plus 201 = 1,542). As discussed later, this conflicts with Clydeplan. The MIR utilises the draft 2019 Housing Land Audit (“HLA”) to put forward an existing supply of 2,480 units, plus 566 net units from ‘preferred’ site allocations in the MIR for a total supply of 3,046 units. This preferred option therefore shows a 1,504 unit surplus over the plan period (with a 1,041 private supply surplus for the Local Authority Area – figures not provided for Housing Sub-Market areas as required by Clydeplan).</p> <p>MIR Alternative Option 2 - The first alternative increases the Housing Supply Target to 5,120 units with the difference being an additional 1,420 units added to the 2025-32 period to reflect recent affordable completion rates. Utilising the same methodology as the preferred option, this provides for an all-tenure HLR of 3,138 units (5,120 - 2,391 completions plus 15% generosity). The draft 2019 HLA supply is then added to 656 (net) proposed allocations which includes a limited number of greenfield sites. The MIR states this option generates a small shortfall of 2 units (with a 136 unit surplus for private supply for the Local Authority area).</p>	

Community Area/Policy Theme**How can we address housing need in the right location?**

MIR Alternative Option 3 - The second alternative, supported in principle (but not calculation) by Barratt Homes, increases the HST to 6,693 units with the difference being an additional 2,993 units added to the 2025-32 period to reflect recent private and affordable completion rates. Utilising the same methodology as the preferred option, this provides for an all-tenure HLR of 4,947 units (6,693 - 2,391 completions plus 15% generosity). The draft 2019 HLA supply is then added to the same 656 (net) proposed allocations as 'alternative 1', leaving an overall shortfall of 1,811 units (1,221 private unit shortfall).

Assessment Issues

The MIR incorrectly calculates the Housing Land Requirement. The MIR Monitoring Statement sets out the preferred and alternative option calculations and the Clydeplan HST is utilised with completions deducted before applying the 15% generosity allowance. This results in a lower HLR than if the generosity is added to the HST and then completions deducted as the 15% generosity has not been applied to the whole plan period. Secondly, the MIR utilises a draft HLA which has not been agreed with the development industry. The 2018 HLA is the latest agreed audit and as a basis for analysing existing supply, this should be used for the LDP MIR calculations. Table 1 on the following page amends the MIR preferred and alternative options when applying these factors.

- For the MIR preferred option, this adjusts the all-tenure surplus from 1,504 units to 752 units
- For the MIR Alternative Option 2, this adjusts the all-tenure shortfall from 2 units to 745 units
- For the MIR Alternative Option 3, this adjusts the all-tenure shortfall from 1,811 units to 2,563 units

The MIR also does not provide analysis of private housing by Housing Sub-Market area as required by Clydeplan. This requires to be assessed to fully assess demand and spatial strategy.

Requirements for Proposed LDP

The LDP MIR has reflected the national drive to increase affordable housing supply by adjusting strategic Housing Supply Targets (via the Local Housing Strategy). However, the preferred MIR option does not reflect this need for increased affordable supply beyond 2024. Whilst it is noted that the current drive is part of the present Parliament, there is no question that this housing need will continue into the second period of the plan (to 2032). As such, the MIR preferred option is not supported as it does not go far enough to address likely affordable housing demand overall. Additionally, as stated above, the spatial strategy approach of delivering new homes solely on urban sites is not supported as the proposed allocations to not provide sufficient range and choice of locations (for both private and affordable). This is evidenced by the proposals for the Kirkintilloch area where housing will essentially be focussed on two locations and delivers predominantly affordable housing. The MIR Alternative Option 2 does address the second period of the plan and allows for affordable provision at recent rates with associated private supply. This approach is welcomed and is considered to be the minimum requirement that East Dunbartonshire should take.

The MIR Alternative Option 3 reflects recent rates of completion for both private and affordable supply and therefore is a positive, growth supporting approach which is welcomed and supported (subject to calculation amendments as highlighted on Page 8). Further MIR assessment for private housing by Housing Sub-Market Area is also required. Overall, additional housing allocations are required to meet the supported Alternative Option 3. Housing Land Requirements should be spread across both Housing Sub-Market areas with a mix of brownfield and sustainable urban extensions providing a greater range and choice of locations for both private and affordable sectors.

Community Area/Policy Theme	How can we address housing need in the right location?		
	PREFERRED OPTION 1	ALTERNATIVE OPTION 2	ALTERNATIVE OPTION 3
How much housing does East Dunbartonshire need? Housing Supply Target (2012-32)	3,732 homes	5,120 homes	6,693 homes
How much new land is required to meet this need? Housing Land Requirement - Includes deduction of completions (2,143 between 2012-18) and 15% generosity	2,149 homes (3732 + 15% - 2143)	3,745 homes (5,120 + 15% - 2143)	5,554 homes (6,693 + 15% - 2143)
How much land is allocated for housing already? Existing Supply - 2018 Housing Land Audit	2,335 homes	2,335 homes	2,335 homes
How much new land is proposed for allocation in LDP2? Site Allocations Site de-allocations	642 homes -76 homes	732 homes -76 homes	732 homes -76 homes
What is the total land supply that would be allocated by this option? Total Supply	2,901 homes	2,991 homes	2,991 homes
How does the total land allocated compare to the Housing Land Requirement? Shortfall/Surplus to Target	+752 homes	-754 homes	-2,563 homes

Table 1 - HLR Housing Land Options Summary - All Tenure (Amended with 2018 HLA Supply)

Iceni Projects c/o Balfour Beatty Homes and Mactaggart & Mickel Homes - The preferred option approach is too cautious. Support reasonable alternative 3 as there is a deficit of 2,680 homes in the greater Glasgow north west housing market area. This is the only option that could deliver enough housing to help remedy the significant deficit. It would also provide the best opportunities for a market response to the desire for a range of housing.

Montagu Evans c/o Caledonian Properties & Mactaggart and Mickel Homes – Support an amended version of alternative option 3. Such an amendment would help to remedy the significant deficit in the Greater Glasgow North West housing market area. The amendments would require the use of the agreed HLA and using the housing land requirement from the base date of the SDP. Request that EDC demonstrate that the land requirement will be met for housing sub market areas and any shortfall is remedied through additional allocations in the Plan. An alternative methodology for calculating the requirement is provided.

Persimmon Homes - ClydePlan set the Housing Land Requirement (HLR) based on 2012 data. At the point that LDP2 will be adopted new housing projections are likely to be available. Based on 2016 national Records for Scotland household projections these are likely to require an increase in the HLR for East Dunbartonshire. Should LDP2 be adopted based on 2012 figures and Option 1 the HLR will result in an under provision of new homes. This will exacerbate demand and is likely to result in concealed households due to the lack of supply driving up house prices and making living in East Dunbartonshire less affordable. Should LDPs move to a 10 year cycle there will be a continued shortfall in supply reducing the Council's control of sites being brought forward. The Council needs to confront the emerging HLR now rather than delaying confronting this issue until a later date.

The principle of addressing the anticipated shortfall in HLR is set out in Paragraph 2.10 of NPF3 which states that "Flexibility is required for different approaches to housing provision that respond to varying

Community Area/Policy Theme	How can we address housing need in the right location?
------------------------------------	---

local requirements.” Addressing population growth and affordability is justification for allocating more land for housing. Furthermore, Scottish Planning Policy also requires that “Local Development Plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption” (Para. 119, SPP).

We disagree with the methodology for calculating the HLR. The Council have calculated the HLR by subtracting completions between 2012-14 from the Housing Supply Target then applying 15% generosity to the remainder. The generosity should have been applied to the initial figure given that completions vary annually and the demand is still there even if house building could not keep pace post-recession. Homes for Scotland have calculated the HLR for 2012-32 by utilising the 2018 Housing Land Audit as follows:

	HLR 2012-2032	Completions 2012-2018	Remaining Requirement + Deallocations	Programmed Supply + Allocations	Shortfall / Surplus
East Dunbartonshire Council All-Tenure Alternative Option 3 Adjusted	7,702	2,143	5,635	3,067	-2,568

By adopting Option 3 the Council will be confronting the shortfall in housing supply the 2012 forecasts will lead to.

Homes for Scotland - Homes for Scotland would support an amended version of Alternative Option 3. The amendments would require the use of the agreed Housing Land Audit and using the HLR from the base date of the SDP. Homes for Scotland also request that East Dunbartonshire Council demonstrate that HLRs will be met for HSMA and any shortfall is remedied through additional allocations in the Plan.

Housing Land Requirements for Housing Sub-Market Areas

Policy 8 of ClydePlan SDP requires that Local Development Plans make provisions to meet the Housing Land Requirements (HLRs) at both the Local Authority Level (All-Tenure and Private) and Housing Sub-Market Area (HSMA) levels, in accordance with Schedules 8,9 & 10.

At the Local Authority Level (All-tenure & Private), the Main Issues Report (MIR) presents three options relating to the HLR and the number of homes to be allocated within the Plan period (2022-2032). Preferred Option 1 in the MIR takes the adjusted Housing Supply Target figure from the SDP and applies a small uplift in period 2012-2024 which, according to the Local Housing Strategy, is to help meet the increased affordable homes target (30,000 to 50,000) over the course of the current Scottish Parliament. This identifies an All-Tenure requirement of 3,700 and a Private Requirement of 2,400 for the 2012-2024 period.

The Local Housing Strategy does not provide an adjusted Housing Supply Target figure for the remainder of the Plan period (2025-2032) and Preferred Option 1 simply uses the SDP HLR figure identifying an All-Tenure requirement of 32 homes.

Community Area/Policy Theme

How can we address housing need in the right location?

The MIR does not provide analysis of the two Housing Sub-Market Areas which fall within the East Dunbartonshire Authority boundary. This is a significant omission as ensuring that HLRs at the HSMA level is a requisite of ClydePlan Policy 8 and therefore very clearly a ‘main issue’ for the LDP.

Homes for Scotland has carried out its own assessment of the housing land supply position at the HSMA level, revealing a significant shortfall in Greater Glasgow North and West (GGNW). The SDP sets the GGNW Housing Land Requirement at 7,430 homes for the period 2012-2024 and a further 3,670 homes for the period 2024-2029. The SDP does not set HLRs beyond 2029 and therefore the remaining years of the LDP period (2029-2032). For the 2029-2032 period, Homes for Scotland has used a pro-rata average of the 2024-2029 requirement, which amounts to 2202 units. This gives a total GGNW HLR of 13,302 for the full plan period.

We have calculated the housing land supply in the GGNW HSMA using historic completions data, agreed delivery programming and extrapolated programming from effective sites using the most up to date Housing Land Audits which have been agreed with Homes for Scotland¹. Our analysis also included LDP Allocations in West Dunbartonshire and the East Dunbartonshire (642 allocation from Preferred Option 1). As table 1 shows, there remains a significant deficit of 2,680 homes in the GGNW HSMA land supply over the plan period even when the Preferred Option 1 allocations are taken into account.

Table 1. Greater Glasgow North and West HSMA Housing Land Supply Position 2012-2032

	HLR 2012- 32	Completions 2012-18	Remaining Requirement 2019-32	Effective Supply Allocations 2019-32	+ Shortfall / Surplus
Greater Glasgow North and West (GGNW) HSMA Private	13302	1569	11733	9053	-2680

The lack of supply in the GGNW in the later years of the Plan period is problematic and is the main contributor to the significant overall shortfall. The yellow line in figure 1 below is an indicator of the number of homes which should be delivered each year if the full HLR (13,302) is to be met by the end of the Plan period. Clearly, at no point in the Plan period does the cumulative number of homes meet the target but figure 1 shows a significant ‘tailing off’ towards the end of the plan period as sites are exhausted and there is a lack of new LDP allocations to replace them.

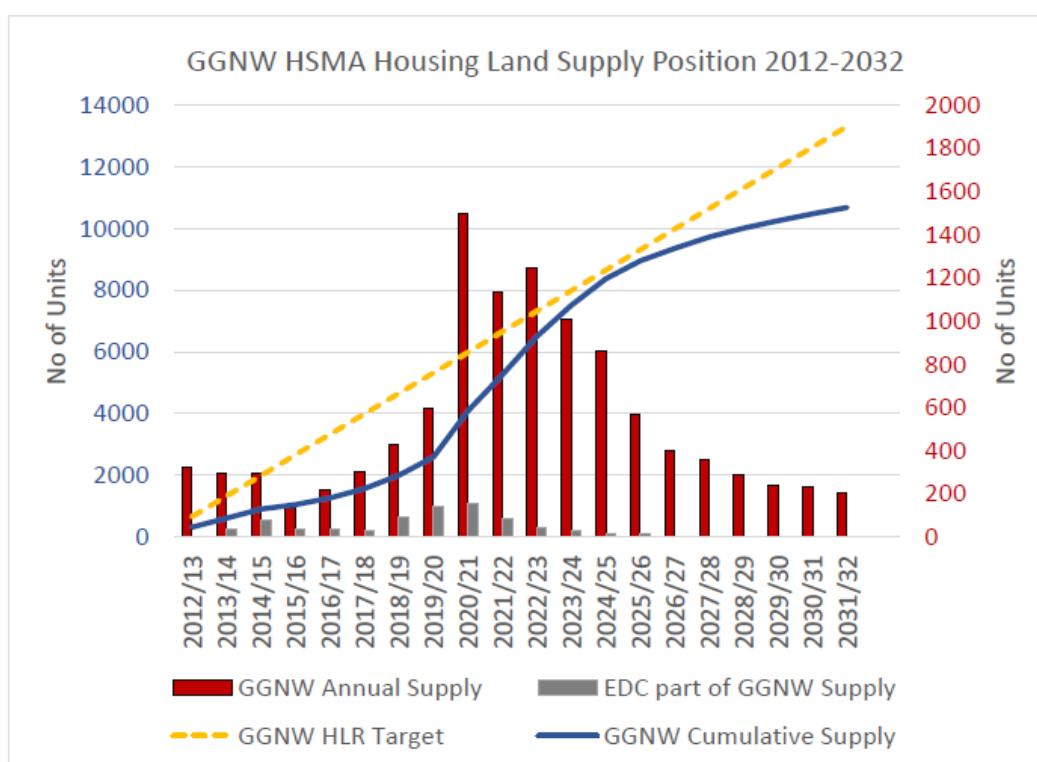


Figure 1. Housing Land Supply Position in the GGNW HSMA across the LDP period 2012-2032

Homes for Scotland objects to Preferred Option 1 as this would mean the HLR not being met at the HSMA level, and not be enough land allocated to meet the needs of the growing population in East Dunbartonshire and reverse the trend of declining affordability.

Alternative Option 3 aspires to accommodate further growth and sustain current delivery rates and is the only option in the MIR which could deliver enough housing to help remedy the significant deficit in the GGNW HSMA. It would also provide the best opportunities a market response to desired range of homes identified elsewhere in the MIR.

Homes for Scotland disagrees with the suggestions that Alternative Option 3 would be unsustainable and contrary to the National Planning Framework and Scottish Planning Policy. Paragraph 2.10 of NPF3 states that “Flexibility is required for different approaches to housing provision that respond to varying local requirements.”. In our view there is a clear need for additional provision in respect of the GGNW HSMA and to accommodate population growth and affordability issues.

Scottish Planning Policy requires that “Local Development Plans in city regions should allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption” (Para. 119, SPP). This is reconfirmed on Diagram which shows the role of the city-region LDP as being to “Meet the Housing Land Requirement (which includes generous margin) and set out how it will be distributed”. Alternative Option 3 in the MIR is the only reasonable option which could help deliver the number of homes required and remedy the significant shortfall in the GGNW HSMA.

Community Area/Policy Theme	How can we address housing need in the right location?
-----------------------------	--

In accordance with paragraph 119 of SPP new allocations must be deliverable over the plan period. Upon review of the proposed allocations which have been made within the MIR, only one out of twenty-five of the proposed allocations has a Homes for Scotland member attached as a developer. As Homes for Scotland is an organisation which is responsible for over 90% private sector completions, this raises greater concerns around the genuine deliverability of the proposed sites. In order to combat declining supply, it is therefore necessary to rigorously assess the effectiveness of new allocations. Homes for Scotland would welcome the opportunity to work with the local authority on this.

The Scottish Government is currently implementing a wide-ranging programme of planning reforms with the stated objective of delivering more, good quality homes. Its recent publication 'Transforming Planning in Practice' confirms this.

Housing Land Requirement – Applying Generosity

The methodology in the MIR calculates the residual HLR for the 2012-24 period in the SDP by subtracting completions from the 2012-24 Housing Supply Target then reapplying the 15% generosity to the residual figure. This approach is not consistent with the SDP and the effect of this is that it incorrectly reduces the requirement and therefore the number of allocations which are required to be delivered in the LDP. Instead, completions should be subtracted from the 2012-2024 Housing Land Requirement set out in the SDP. The SDP states that:

“For purposes of strategic planning, it is essential to consider the longer term supply of land available to meet housing need and demand for the planning periods from the base year of 2012, to 2024 and 2029” (para. 6.67).

Schedules 9 and 10 of the SDP addresses the land supply by Housing Sub-Market Area and Local Authority, including 2012/2013 completions. The SDP suggests that completions to date are offset against the HLR. In Table 2 below, Alternative Option 3 has been adjusted using the HLR for the 2012-2032 period in accordance with the SDP and Scottish Planning Policy. It is based upon 2018 HLA which is the latest audit which has been agreed with Homes for Scotland.

Table 2. Adjusted Housing Land Supply for Alternative Option 3 2012-2032

	HLR 2012-2032	Completions 2012-18	Remaining Requirement + Deallocations	Programmed Supply Allocations +	Shortfall / Surplus
East Dunbartonshire Council All-Tenure Alternative Option 3 Adjusted	7702	2143	5635	3067	-2568

NHS Greater Glasgow & Clyde (NHSGCC) - NHSGGC do not have a specific view on the proposals within issue 34, however, we are aware of the need to review the potential need for additional health related facilities. NHSGGC continue to support the need to further and detailed engagement in relation to the potential impact both existing and new developments may have on the delivery of healthcare.

Barton Willmore c/o Cala Homes - the housing land approach that has been taken by EDC in their preferred approach with the release of limited sites across the authority area, is extremely conservative, inflexible and short sighted. There is an opportunity to prepare for the longer-term future growth that is expected within the industry in this area, but EDC have opted not to pursue an option that allows that. We question the effectiveness of the approach to deliver the housing numbers suggested and also seek clarification in

Community Area/Policy Theme	How can we address housing need in the right location?
<p>terms of the housing sub-market area considerations, where Homes for Scotland have identified a significant shortfall in units within the period of the plan, particularly in Bearsden and Milngavie.</p> <p>North Planning & Development c/o Scottish Water - Scottish Water are supportive of the 'Reasonable Alternative' Option 3. To support significant growth and help sustain private house building in East Dunbartonshire, Scottish Water seek the allocation site Auchenhowie Road for residential development. The case for this land to be allocated is set out at in associated representation to Issue 25.</p> <p>SPT – Agree with the preferred option. The approach to housing land requirement supports integrated communities with sustainable travel options.</p> <p><u>Barton Willmore, for Bellway Homes</u> – Do not agree with the preferred approach.</p> <p>Bellway are of the view that the approach taken for Issue 34 is extremely conservative and doesn't take into account the opportunity for future growth opportunities beyond that which is suggested by Clydeplan.</p> <p>We note that the proposed housing figures have been set against the figures of Clydeplan, which have been disputed previously and are recognised as being very low. It is considered within the housing industry, that it is inevitable that future growth will be at a greater rate than that presented within Clydeplan. EDC should position itself to be able to harness that expected growth, rather than being reactive. In essence, EDC should be planning for growth, not decline.</p> <p>We note the approach to encourage the use of brownfield sites for further housing development in addition to that which has been allocated in the preferred approach. One of the reasons that the Council have sought to take this position is that it 'Facilitates the regeneration of vacant land which is unproductive and can be unattractive or pose a safety risk'.</p> <p>Bellway recognise the benefits and attributes to developing brownfield sites and are involved in a number of brownfield regeneration projects across the country. Notwithstanding this, the reason that is presented above sets out exactly why it is extremely difficult to promote brownfield land as part of the housing allocation strategy for the local authority.</p> <p>Brownfield land is less straight forward to develop for housing as it has increased technical issues and unattractive qualities for potential home buyers given the potential safety risk. In order to make brownfield sites effective, it becomes extremely costly for housebuilders, impacting upon viability and deliverability.</p> <p>For this reason, it is considered that the Council should provide additional flexibility to assist in the delivery of these sites through additional land release for housing development.</p> <p>In summary it is considered that the housing land approach that has been taken by EDC in their preferred approach with the release of limited sites across the authority area, is extremely conservative, inflexible and short sighted. There is an opportunity to prepare for the longer-term future growth that is expected within the industry in this area, but EDC have opted not to pursue an option that allows that. We question the effectiveness of the approach to deliver the housing numbers suggested with the suggestion that it will encourage the use of brownfield sites.</p>	

Community Area/Policy Theme	How can we address housing need in the right location?
<p>Keppie, Ashfield Land - Do not agree with the Preferred Option. We would suggest progressing with Reasonable Alternative 3 of 'Table 1: Housing Land Options Summary – All Tenure'; adjusting the target to accommodate significant growth.</p> <p>Do not agree with the use of a story map for the Housing Land Audit and there are a number of discrepancies between the Aug 2019 draft audit and the position as summarised and presented in the MIR 'storymap', in particular the totals for 5-year effective All-Tenure supply and Established supply.</p> <p>Housing supply will fall away abruptly nearing the end of the LDP2 period, with as little as only 44 units programmed for delivery in 2025/26, compared with 473 units programmed in 2021/22. There is extremely limited supply of new market housing land in Milton of Campsie across the coming 5-year period, and as such, we commend the allocation of land West of Birdston Road to provide additional range and choice in the supply. There are no private market units due to be delivered anywhere in Milton of Campsie beyond 2020/21, and the MIR proposes the release of only 2 additional affordable units in Lennoxton. This does not represent a generous supply of housing land, nor does it maintain a 5-year housing land supply with a range of housing locations.</p> <p>North Planning & Development, for Taylor Wimpey – Taylor Wimpey are supportive of the 'Reasonable Alternative' Option 3.</p> <p>According to the Monitoring Statement, the development strategy is currently 3,128 homes short of meeting existing and future housing need and demand / housing supply target in East Dunbartonshire. It is recommended that this calculation is adopted for the Proposed LDP 2. Taking account of the Preferred and Alternative housing allocations of 732 homes, there would be an outstanding shortfall of 2,396 homes to meet through further housing allocations.</p> <p>The proposed amendment based on the 2016-Household Projections and Alternative Option 3 are in broad alignment, with similar shortfalls. No other Option (Preferred Option or Alternative Option 2) presented in the MIR addresses the existing need and future demand in East Dunbartonshire.</p> <p>Alternative Option 3 should be adopted for Proposed LDP 2. To support significant growth and help sustain private house building in East Dunbartonshire, the Council should adopt Option 3, and to assist with this Taylor Wimpey seek the allocation site Rowantree Place, Lennoxton (Council ref. S314) for the development of approximately 100 dwellinghouses. The case for this land to be allocated is set out in associated representation to Issue 21.</p> <p>Dawn Homes Ltd - Agree with and support the statement made by Homes for Scotland in relation to Issues 33,34,35,36 and 37. In response to Issue 34 - like Homes for Scotland broadly agree with the aspirations of Alternative Option 3 to accommodate further growth and sustain current delivery rates. Agree this is the only option in the MIR which could deliver enough housing to remedy the significant deficit in the GGNW HSMA. This option would also provide opportunities for the market to deliver a more diverse range of housing types as identified in other issues contained in the MIR. Alternative option 3 would not be contrary to National Planning Policy or Scottish Planning Policy.</p> <p>SNH - We acknowledge the need to deliver the Council's housing requirements and maintain alignment /consistency with the 'Compact City Model' of the SDP (Clydeplan 2). We support the intention to realise this through the prioritisation and utilisation of brownfield land, limiting urban sprawl and protecting East</p>	

Community Area/Policy Theme	How can we address housing need in the right location?
<p>Dunbartonshire’s special natural and built environment. However, we would highlight our comments in relation to housing sites in the respective community areas and in particular, Bishopbriggs in terms of Issue 10:Westerhill and Issue 11:Housing in Bishopbriggs.</p> <p>Iceni Projects (For Balfour Beatty Homes and Mactaggart & Mickel Homes – Crofthead 1 & 2, Bishopbriggs)</p> <p>Our client supports Reasonable Alternative Option 3, subject to an adjustment of the figures as outlined in this section to accommodate further significant growth and sustain the current delivery rates. This option projects forward the recent rate of private and affordable housing development in order to allow significant growth and sustain private housing building in East Dunbartonshire. Our client has taken an approach consistent with Homes for Scotland (HfS) in their analysis of the housing land requirement for EDC. Please refer to the HfS representation to the MIR for additional detail.</p> <p>Policy 8 of ClydePlan SDP requires that Local Development Plans make provisions to meet the Housing Land Requirements (HLRs) at both the Local Authority Level (All-Tenure and Private) and Housing Sub-Market Area (HSMA) levels, in accordance with Schedules 8, 9 & 10.</p> <p>At the Local Authority Level (All-tenure & Private), the Main Issues Report (MIR) presents three options relating to the HLR and the number of homes to be allocated within the Plan period (2022-2032).</p> <p>Preferred Option 1 in the MIR takes the adjusted Housing Supply Target figure from the SDP and applies a small uplift in period 2012-2024 which, according to the Local Housing Strategy, is to help meet the increased affordable homes target (30,000 to 50,000) over the course of the current Scottish Parliament. This identifies an All-Tenure requirement of 3,700 and a Private Requirement of 2,400 for the 2012-2024 period.</p> <p>The Local Housing Strategy does not provide an adjusted Housing Supply Target figure for the remainder of the Plan period (2025-2032) and Preferred Option 1 simply uses the SDP HLR figure identifying an All-Tenure requirement of 32 homes. This is clearly not appropriate and we would suggest is a serious failing of the MIR to not plan beyond the initial period as presented in the MIR.</p> <p>The MIR does not provide analysis of the two Housing Sub-Market Areas which fall within the East Dunbartonshire Authority boundary. This is a significant omission as ensuring that HLRs at the HSMA level is a requisite of ClydePlan Policy 8 and therefore very clearly a ‘main issue’ for the LDP.</p> <p>The SDP sets the Greater Glasgow North-west Housing Land Requirement (GGNW HLR) at 7,430 homes for the period 2012-2024 and a further 3,670 homes for the period 2024-2029. The SDP does not set HLRs beyond 2029 and therefore the remaining years of the LDP period (2029-2032). For the 2029-2032 period, a pro-rata average of the 2024-2029 requirement can be used, which amounts to 2202 units. This gives a total GGNW HLR of 13,302 for the full plan period.</p> <p>HfS calculated the housing land supply in the GGNW HSMA using historic completions data, agreed delivery programming and extrapolated programming from effective sites using the most up to date Housing Land Audits which have been agreed with Homes for Scotland. Their analysis also included LDP Allocations in West Dunbartonshire and East Dunbartonshire (642 allocation from Preferred Option 1).</p>	

Community Area/Policy Theme	How can we address housing need in the right location?
------------------------------------	---

As table 1 shows, there remains a significant deficit of 2,680 homes in the GGNW HMSA land supply over the plan period even when the Preferred Option 1 allocations are taken into account.

Table 1

	HLR 2012-32	Completions 2012-18	Remaining Requirement 2019-32	Effective Supply + Allocations 2019-32	Shortfall / Surplus
Greater Glasgow North and West (GGNW) HSMA Private	13302	1569	11733	9053	-2680

The lack of supply in the GGNW in the later years of the Plan period is problematic and is the main contributor to the significant overall shortfall. 13,302 units are to be delivered by the end of the Plan period. Clearly, at no point in the Plan period does the cumulative number of homes meet the target but the HfS analysis shows a significant ‘tailing off’ towards the end of the plan period as sites are exhausted and there is a lack of new LDP allocations to replace them.

As advised above, alternative Option 3 aspires to accommodate further growth and sustain current delivery rates and is the only option in the MIR which could deliver enough housing to help remedy the significant deficit in the GGNW HSMA. It would also provide the best opportunities a market response to desired range of homes identified elsewhere in the MIR.

The methodology in the MIR calculates the residual Housing Land Requirement for the 2012-24 period in the SDP by subtracting completions from the 2012-24 Housing Supply Target then reapplying the 15% generosity to the residual figure. This approach is not consistent with the SDP and the effect of this is that it incorrectly reduces the requirement and therefore the number of allocations which are required to be delivered in the LDP2.

Instead, completions should be subtracted from the 2012-2024 Housing Land Requirement set out in the SDP. The SDP states that:

“For purposes of strategic planning, it is essential to consider the longer term supply of land available to meet housing need and demand for the planning periods from the base year of 2012, to 2024 and 2029” (para. 6.67).

Schedules 9 and 10 of the SDP addresses the land supply by Housing Sub-Market Area and Local Authority, including 2012/2013 completions. The SDP suggests that completions to date are offset against the HLR.

In Table 2 below, produced by HfS, Alternative Option 3 has been adjusted using the HLR for the 2012-2032 period in accordance with the SDP and Scottish Planning Policy. It is based upon 2018 HLA which is the latest audit which has been agreed with HfS.

Community Area/Policy Theme	How can we address housing need in the right location?
-----------------------------	--

Table 2

	HLR 2012- 2032	Completions 2012-18	Remaining Requirement + Deallocations	Programmed Supply + Allocations	Shortfall / Surplus
East Dunbartonshire Council All-Tenure Alternative Option 3 Adjusted	7702	2143	5635	3067	-2568

As can be seen above there is a significant shortfall (2568 all tenure units) in this adjusted reasonable alternative 3 option. In summary, reasonable alternative option 3 is the only route that can ensure the LDP2 accords with the SDP and meets the requirements of the wider housing market.

In addition, in accordance with paragraph 119 of SPP new allocations must be deliverable over the plan period. Upon review of the proposed allocations which have been made within the MIR, only one out of twenty-five of the proposed allocations has a Homes for Scotland member attached as a developer. As Homes for Scotland is an organisation which is responsible for over 90% private sector completions, this raises greater concerns around the genuine deliverability of the proposed sites. In order to combat declining supply, it is therefore necessary to rigorously assess the effectiveness of new allocations.

The Crofthead Phase 1 Site forms part of the Council’s Housing Land Supply and is an effective site which will contribute to meeting requirements.

Issue 35 – Should LDP2 include specific measures to address the ageing population and how should this be done?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Enhancements to the specialist housing policy including the allocation of sites in accessible locations specifically for older people and introduce a requirement for larger sites to provide a proportion of the units for older people.	2. Allocate sites, and introduce quota policy, for smaller housing units that are likely to appeal to and cater for older people, such as flats and single level/ stairless properties, however without specific burdens that the occupants must be older persons.

Summary of comments from individuals:

addresses the age related need for additional currently stretched services

- Developers must provide more flats for downsizers and 1st time buyers.

Community Area/Policy Theme	How can we address housing need in the right location?
<ul style="list-style-type: none"> • New housing, including affordable housing, should not just be for older people, younger people too. • Definitely agree with smaller housing. • The aging population in the area is not really being catered for, except by expensive commercial Care Homes and the impact upon services for older people must be considered. <p><i>Summary of responses from groups and organisations:</i></p> <p>RFA Consultants (Boghead Rd) - East Dunbartonshire requires new novel approaches to address the housing needs of an ageing population as evidenced by the Monitoring Report. Boghead provides an ideal accessible location for elderly and the over 55 population. These requirements are part of the overall needs identified in the HNDA and Local Housing Strategy. Demand for such accommodation outstrips supply with many older households in inappropriate larger accommodation.</p> <p>Our client is seeking an enhancement to the specialist housing policy of the Council in accordance with the Preferred Alternative. This proposal directly addresses the measures required in respect of the ageing population with the Care Home and Assisted Living components being an integral part of the proposal. Integration with the wider community and social interaction is a function of good placemaking and design. Amenity considerations rather than imposing occupancy restrictions should be the purpose of the LDP. We note the research being undertaken by the Health and Social Care partnership and that this will influence requirements locally in a positive way.</p> <p>Gladman - We do not agree either the preferred or alternative option and it is unnecessary to include a specific policy requiring sites be allocated for older people or a quota for smaller housing units to cater for older people. Any application for residential development would typically include a range of type and size of housing influenced by market demand in the area and the Council. Therefore, proposals for housing should include new homes which suited to all age-groups as demanded, which ensures the creation of a diverse and balanced community that sustains local facilities.</p> <p>Milngavie Community Council – Agree with preferred option</p> <p>Lichfields for Extra lifestyle ltd (S346 kirk Gateway) - Once implemented, the Planning (Scotland) 2019 Act will introduce new requirements in relation to planning for housing needs of older people and disabled people. While the East Dunbartonshire Local Development Plan is being prepared under the current planning system rather than the emerging one, it is prudent to consider how best to plan for older peoples’ housing, and Lichfields and our client are supportive of the steps being taken by East Dunbartonshire Council. The two options presented are:</p> <ul style="list-style-type: none"> • Preferred: Enhancements to the specialist housing policy including the allocation of sites in accessible locations specifically for older people and introduce a requirement for larger sites to provide a proportion of the units for older people. • Alternative: Allocate sites, and introduce quota policy, for smaller housing units that are likely to appeal to and cater for older people, such as flats and single level/ stairless properties, however without specific burdens that the occupants must be older persons. <p>Both options recommend making specific allocations for housing for older people. It is noteworthy from our own research (April 2019 – Appendix 2) that very few authorities across the UK make allocations for</p>	

Community Area/Policy Theme	How can we address housing need in the right location?
	<p>housing for older people, with none in Scotland. On this basis it is hard to measure the success or otherwise of comparative efforts elsewhere in the country to allocate land for older people's housing. In making allocations there are a number of factors to consider which should influence the assessment and selection of sites. Specialist housing is more resource hungry than standard housing. Either because: single storey bungalow style housing by its very nature is very low density, or; in the case of flatted development requirements for lifts, wider circulation areas and additional low to no profit ancillary facilities take up space which a traditional housebuilder could make more profitable. On this basis, a site which has been identified as suitable for residential development, allocated for specialist housing or otherwise, will almost inevitably generate higher bids from traditional housebuilders when placed on the market. Allocations for specialist housing should therefore be made with a willing landowner and/or developer in mind. For the same reasons described above, when assessing land to be allocated for older people's housing or writing policy to encourage it, consideration should be given to market forces and incentives to bring such development forward. Land which has historically been identified for employment but for whatever reason is not marketable can present good potential.</p> <p>As policies protecting such employment sites from certain uses are commonplace, these do not as readily attract the attention of traditional housebuilders. Making the delivery of older peoples, or other specialist housing, an acceptable departure subject to other important placemaking and amenity requirements alongside maintaining the wider objectives of the plan could present good opportunities to bring underutilised land into active use, with employment opportunities associated with care, as well as meeting some of this particular housing need. Another suggestion is to provide clarity on a definition on what constitutes housing for older people. Lifetime Homes standards provide the ability for families to age within their homes being adaptable over time as needs progress. Over 55's housing is a readily accepted type as are care homes. In some instances, low density single storey housing can also be considered suitable. Clarity on what constitutes such development should be embedded within the development plan, until such time as this is provided at a national level through implementation of the 2019 Act.</p> <p>In light of the above, we are supportive of the focus on older people's housing in the emerging LDP and that by commissioning the research referred to in Appendix 5 of the MIR is ahead of the game in doing so. We are supportive of including specific allocations within the LDP, but these must be identified with the support of a landowner or developer.</p> <p>Iceni Projects c/o Balfour Beatty Homes and Mactaggart & Mickel Homes & Montagu Evans c/o Caledonian Properties & Mactaggart and Mickel Homes - Disagree with both options. There is no evidenced need for a new policy provision on this topic, and it would be appropriate to await policy and guidance arising from the new Planning (Scotland) Act provisions on planning for the housing needs of older people. The current LDP policy for Diverse Communities is reasonably flexible and appropriate and should be retained for the time being.</p> <p>Persimmon Homes - As with Issue 33 setting quotas for site or allocating specific sites would affect development viability given the range of developer contributions, including affordable housing, also sought. Many new private homes comply with the Housing for Varying Needs standards ensuring that they are adaptable and by incorporating them into wider private developments there is a diverse and balance community with a range of ages. There are also specialist house builders that deliver homes focused on older people where there is market demand for such products. The status quo should be retained where the market dictates what housebuilders will build.</p>

Community Area/Policy Theme**How can we address housing need in the right location?**

Homes for Scotland - Homes for Scotland does not support either of the options presented. In our view there is no evidenced need for a new policy provision on this topic, and it would be appropriate to await policy and guidance arising from the new Planning (Scotland) Act provisions on planning for the housing needs of older people. The current LDP policy for Diverse Communities is reasonably flexible and appropriate and should be retained for the time being.

The Preferred Option proposes allocating housing sites specifically for older people and introducing a requirement for larger sites to provide a proportion of units for older people. It would be difficult to make this work through the market delivery model. Rather than allowing the continued creation of diverse and balanced communities, where young families will often live besides retired couples and young singles, the approach of quotas or allocating specific sites has the potential to stultify sites that could be contributing to general housing delivery.

As the Council will be aware, there are private housing providers who already specialise in elderly housing provision, responding well to market demand. The Reasonable Alternative Option proposes allocating sites and introducing quotas for smaller housing units that are likely to cater for older people. This alternative is not significantly different from the preferred option and Homes for Scotland disagrees with it for the same reasons.

East Dunbartonshire Visually Impaired People's Forum & National Federation of the Blind UK -

Do not agree with either the Preferred Option, or with the Reasonable Alternative Option, as put forward in the MIR document. Neither options recognise the reality of a rapidly ageing population that will live longer, or that already 24% of the Scottish population by the latest Scotland Census are disabled. Disabled people using wheelchairs and walking aids to get around do not wish to be isolated from their neighbours by stair-only access. Nor do the two options in the MIR document recognise that older people need to be able to visit and be visited by others so they can continue to play a part in a caring society e.g. through baby-sitting; and can be cared for in their turn by friends, neighbours and younger relatives. Upper floor flats developed without secure lift access being built into them when developed - despite this being what British Standards recommend they should be in the case of 3-storey high blocks - are not a long term solution

Issue 35 Other Alternative Option

The preferred option might be rewritten as follows:

Enhancements to the specialist housing policy including the allocation of sites for new and re-purposed building developments in accessible locations specifically for older people; will ensure that streets and paths are accessible for all and not shared with motorists or cyclists; and introduce a requirement for larger sites to provide a proportion of the units for older people. Where blocks with two or more floors above ground are developed, LDP2 policy will require lift access, with secure user access, and back-up power for emergencies, to all such flats. The Council will consider rescinding planning consents given for new social housing where the council itself is the developer, where development is yet to commence, and where the dwellings and neighbourhoods suiting older people can be made fully accessible for disabled and older people.

Reason

- Seeks to address the aging population.

Community Area/Policy Theme	How can we address housing need in the right location?
<ul style="list-style-type: none"> • Encourages smaller sized and accessible housing such as flats and single level/ stairless /safe and secure lift access to upper floor flat properties, and properties with on-site support with care and/ or maintenance. • Encourages development with on-site facilities and opportunities for social interaction. • Must ensure that new developments are integrated with wider communities. 	
<p>Note that the Council and Health and Social Care Partnership have commissioned a research study on older peoples and specialist housing which is ongoing. This option is subject to the recommendations of the study.</p>	
<p><u>Additional reasons:</u></p>	
<ul style="list-style-type: none"> • lift access policy would ensure that older people can choose to live in any new development with family or to live close to the friends and neighbours they rely on for support, or whom they in turn support with children and family disability care. • would meet the recommendations of BS 9266:2013 that all new flats in blocks where there are to be two floors in addition to the entrance level (i.e. three storeys) should have passenger lift access to be accessible. • would recognise the advice given in September 2019 by Architecture and Design Scotland in "Town Centre Living: A Caring Place" that accessible, adaptable and inclusive housing can be achieved in Scottish town centres, both in new build and re-purposed housing, where there are features like non-commercial ground floor uses and inter-generational dwellings • would address deficiencies in provision of social housing given planning consent but not yet commenced where full access is only available to ground floor units or to first floor units with straight-stair private access, but not to any upper floor flats. 	
<p>Iceni Projects (For Mactaggart & Mickel Homes) - As per our response to Issue 33, our client is supportive in principle given it is the strategy for the promotion site to provide smaller homes to accommodate downsizers, retirement living to tackle the ageing population issues. However, our client does not support either or the options presented. In our view there is no evidenced need for a new policy provision on this topic, a site-specific approach is required and it would be appropriate to await policy and guidance arising from the new Planning (Scotland) Act provisions on planning for the housing needs of older people. The current LDP policy for Diverse Communities is reasonably flexible and appropriate and should be retained for the time being.</p>	
<p><u>Issue 36 – How can the developer contributions policy in the LDP be improved to provide greater detail and clarity on when contributions will be required and how they will be spent?</u></p>	
<p><u>Preferred Option</u></p> <p>1. Provide additional detail on developer contributions in the LDP, review the need to provide greater detail/ methodologies for any of the existing contributions and restructure the framework for open space contributions.</p>	<p><u>Reasonable Alternative Option</u></p> <p>2. Limited updates to LDP policy and refer to Supplementary Planning Guidance.</p>

Community Area/Policy Theme	How can we address housing need in the right location?
<p data-bbox="204 376 676 412"><i>Summary of comments from individuals:</i></p> <ul data-bbox="252 461 1347 640" style="list-style-type: none"> • There is absolutely no consideration of the ability (or not) of the local Health Service to deal with the impact of new development. • Development needs to consider impact on education as well. • It is really important that developers aren't able to split sites into smaller chunks to avoid making contributions. <p data-bbox="204 685 1353 826">Jo Swinson (MP at time of consultation) - Residents are not only concerned about the impact of new builds on school capacity. They have also stressed that an increasing population is meaning people are having to wait longer to get GP or nurse appointments, there's not enough care support for the elderly, and that the necessary infrastructure is not being properly planned for.</p> <p data-bbox="204 869 1350 1008">And they have reason to think like this. Woodilee housing estate was built with little consideration given to public transport links to Lenzie or Glasgow; many homes were not able to access to fibre broadband for a considerable amount of time after moving in; and initial suggestions of a nursery and sports arena have not materialised.</p> <p data-bbox="204 1052 847 1088"><i>Summary of responses from groups and organisations:</i></p> <p data-bbox="204 1131 858 1167">Milngavie Community Council – Agree with preferred option.</p> <p data-bbox="204 1207 1353 1684">Lichfields for Extralifestyle ltd (S346 Kirkintilloch Gateway) - Once implemented, the Planning (Scotland) Act 2019 in Section 9 will repeal Section 22 of the Town and Country Planning (Scotland) Act 1997 as amended. The result will be that Supplementary Guidance will no longer have development plan status, nor will there be a statutory consultation period before being considered by Scottish Government prior to adoption. The MIR's preferred option for the Developer Contributions policy is that it will include greater detail than as existing. Supplementary Guidance presently contains the necessary detail and sits alongside the LDP. The alternative option is to maintain the status quo. While the LDP is being prepared in the context of the 1997 Act as yet unaffected by the 2019 Act, uncertainty surrounding the transitional arrangements which will be put in place as the latter comes in to force. Therefore, by opting for the preferred approach in this instance, East Dunbartonshire Council is ensuring that developer contributions policy is adequately consulted on and considered by the Scottish Government prior to adoption/approval. It will also ensure that the policy is afforded development plan status which will provide certainty to the Council and the development industry. As a result, the preferred option is supported.</p> <p data-bbox="204 1727 1345 1946">Clarendon Planning for Barratt Homes - support the preferred option of providing additional detail on developer contributions in the LDP rather than as separate Supplementary Planning Guidance. The range of issues to be investigated is noted, including nursery education, healthcare, recreation facilities, electric vehicle charging, air quality and revisiting open space requirements. Healthcare requirements need to be particularly carefully assessed in terms of the need to financially contribute to commercially-run services but Barratt Homes welcome the opportunity to engage with East Dunbartonshire Council on these issues.</p>	

Community Area/Policy Theme	How can we address housing need in the right location?
<p>Montagu Evans c/o Caledonian Properties & Mactaggart and Mickel Homes – Disagree with both preferred and alternative. Any proposed contributions must comply with Planning Circular 3/2012 and this should form the basis of any new policy.</p> <p>Persimmon Homes - We support the existing mechanism where developer contributions are covered by Supplementary Planning Guidance (SPG). Including formulas associated with development contributions within the LDP would make the LDP cumbersome and potentially out of date during the life of the LDP. The latter is of particular concern when LDPs could move to a ten-year cycle. Retaining a separate SPG ensures that it can respond to issue specific matters rather than the whole LDP having to be reviewed. Where appropriate individual development briefs can also cover potential site-specific developer contributions. We are also of the view that developer contributions should cover the existing matters in the current SPGs and not those devolved to the Scottish Government and not overseen by the Council, for example healthcare is not a planning matter.</p> <p>Homes for Scotland - Homes for Scotland supports the principal of the preferred option, which is to provide additional detail on developer contributions in the LDP. With Statutory Supplementary Guidance due to be removed from the planning system within this plan period, the only alternative would be to rely on information guidance which would have very limited weight. We cannot fully endorse the preferred option at this stage as too little information is available to discern what type and level of developer contributions might be sought – and we would appreciate further consultation and discussions on detailed intentions for developer contributions prior to the publication of the Proposed LDP.</p> <p>Go Bike - Housing for all must be readily accessible by active and public transport and building on brownfield sites, correctly decontaminated where necessary, should assist in this. It must be remembered that many people who have difficulty walking are able to ride a bike and good cycle access in housing schemes is essential. Active travel and public transport must be considered before the current practice of every house or flat having a private car parking place is considered. Again, the principles of “Designing Streets” must be followed.</p> <p>SEPA - support the review of developer contributions to explore wider options. Existing policy in the adopted LDP includes green-network opportunities, nature conservation, flood risk management, provision and management of DUS and water and sewerage infrastructure. It would be useful to consider extension of contributions to biodiversity to achieve net biodiversity gain and water environment improvements be considered. However, it would be useful to review how effective existing policy has been in delivering on the aspects already contained within existing Policy 20. We would be happy to engage to discuss these aspects in more detail.</p> <p>Network Rail – Agree with preferred option. In respect of Issue 36, Network Rail would support the preferred option of providing greater detail on developer contributions and investigating new approaches. The new Planning (Scotland) Act 2019 has retained the powers to enter into planning obligations and it will be for secondary legislation to bring forward how new approaches, such as infrastructure levies might be used to facilitate rail and other infrastructure development. The Scottish Government have recently produced the Planning: Post-bill work programme (30 Sept 2019) and it is noted that there will be engagement with local authorities, the Scottish Land Commission, the Scottish Futures Trust, and industry representatives, to properly explore new approaches on issues such as the infrastructure levy and land value uplift capture. Whilst the intention of Issue 36 is to future-proof, it is hoped that the timing of the forthcoming secondary legislation (as yet unknown) will allow new approaches to be incorporated into</p>	

Community Area/Policy Theme	How can we address housing need in the right location?
<p>policy at the proposed LDP2 stage, particularly where enhancements to the rail infrastructure are proposed e.g. new stations, park and ride facilities.</p> <p>SPT – Agree with the preferred option. The approach to developer contributions will provide greater certainty to developers and communities around what is expected from development. The more proportionate approach should support a range of development types. Developer contribution policy should include public transport infrastructure and services.</p> <p>SNH - We agree with the preferred option to include the details and requirements within the LDP. This will provide greater certainty, robustness and clarity for developers from the outset.</p> <p>NHS Greater Glasgow & Clyde (NHSGCC) - NHS GGC support the premise of issue 36 within the MIR to provide greater detail and clarity on developer contributions and how they will be spent. In particular, NHS GGC welcome the specific reference to healthcare in the emerging developer contributions policy and we welcome further involvement, along with the HSCP, in the development of the Proposed LDP policy on this issue. NHS GGC believe that the existing developer contributions policy position should be improved in the new LDP, with a policy requirement for financial contributions from housing development to towards the improvement and development of healthcare facilities written into the development plan policy. This is particularly important as budgetary pressures on the NHS make it more difficult to meet the healthcare requirements for the existing population, let alone accommodate additional pressure from new developments.</p> <p>NHS GCC have undertaken an assessment of the residential development pipeline in East Dunbartonshire in order to understand the impact of future housing delivery on healthcare services. As set out in EDC’s 2018 Housing Land Audit, 2,335 dwellings are programmed for completion in the period to 2025 (the draft 2019 HLA provides for an established housing land supply of 2,480 units to 2026). We note that the majority of the proposed dwellings are located within the settlements of Kirkintilloch, Lenzie, and Lennoxton, with substantial land releases proposed around Bishopbriggs in the MIR. NHSGCC hold major concerns the proposed residential developments will place additional burdens on existing local healthcare facilities, which are already under significant pressure. The importance of Health Boards and Local Authorities working together to address these pressures was further highlighted in the joint letter from the Minister of Local Government, Housing and Planning and Cabinet Secretary for Health and Sport, which was sent to all Health Board and Local Authority Chief Executives in March 2019. In particular, NHS GGC are of the strong view of that contributions towards healthcare facilities should be separated from the generic ‘community facilities’ contribution type (in the same way that education is currently considered in the existing Supplementary Guidance).</p> <p>NHS GGC therefore support the preferred option for issue 36 of the East Dunbartonshire Main Issues Report. We consider that this should formalise a specific policy which a) acknowledges the challenges within the existing health estate in light of existing/proposed development and b) provides explicit recognition for the requirement for contributions towards healthcare facilities from housing development. Across Scotland there are emerging examples of either adopted or proposed supplementary guidance on developer contributions having explicitly set out the requirements for healthcare facilities, such as: NHS Grampian – Moray & Aberdeenshire Councils NHS Forth Valley – Falkirk and Stirling Councils NHS Lothian – City of Edinburgh Council.</p>	

Community Area/Policy Theme	How can we address housing need in the right location?
-----------------------------	--

Issue 37 – How can the LDP ensure that the cost of developer contributions is proportionate to the scale and type of housing development?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Apply a method based on the number of bedrooms in each new property to adjust the overall cost of contributions so that they are proportionate to the size of units provided.	2. Apply an alternative method based on house type or floor space to adjust the overall cost of contributions so that they are proportionate to the size of units provided.

Summary of comments from individuals:

None

Summary of responses from groups and organisations:

Milngavie Community Council – Agree with preferred option. With regard to estimating the size of dwellings, we suggest that total floors space may have significant advantages over the number of bedrooms, despite being a less simple measure. In Milngavie, a development of 2-bedroomed flats was recently proposed, each having more floor space than most of the existing 4-bedroomed houses in the area.

Geddes Consulting – Support alternative option. No evidence or justification for this approach has been provided, i.e. to demonstrate that the pupil product from larger homes is actually higher than that from smaller homes. No explanation is provided to determine the level of contributions that will be sought per bedroom, or the pupil product ratio that will be applied per bedroom. The Reasonable Alternative Option is considered to be more appropriate on the proviso that the alternative method is based on house type rather than floor space. This is on the understanding that the method will result in separate overall costs for flats and houses, as it is expected that houses are more likely to generate pupils than flats. As above, reference to floor space should be removed as no evidence has been provided to demonstrate that the pupil product from larger homes is actually higher than that from smaller homes. It is also considered appropriate to make one bed flats exempt from making developer contributions toward education infrastructure. The nature of one bed flats means that they are unlikely to generate any pupils.

Lichfields for Extralifestyle ltd - Lichfields considers that the alternative option has the potential to unfairly disadvantage developers of and adversely impact upon the viability of more specialist housing types which have greater floorspace requirements. With smaller margins, the viability of these developments are in themselves more susceptible to abnormal costs. On this basis the preferred option to calculate developer contributions on room numbers as opposed to floor areas is supported.

Clarendon Planning for Barratt Homes - With regard to how the LDP ensures the cost of overall contributions is proportionate to the scale and type of housing being proposed, it is noted that the MIR preferred option is to calculate on a bedroom basis as opposed to the alternative housetype or floor area basis. The MIR reasoning is to improve the viability of developing smaller housing units. It is agreed that a

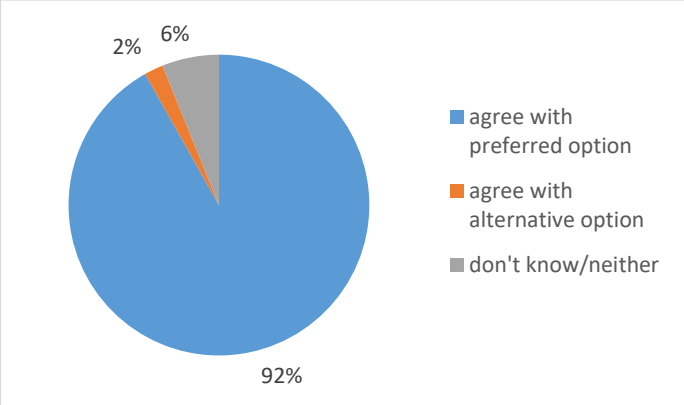
Community Area/Policy Theme	How can we address housing need in the right location?
<p>calculation based on floor area would be overly complicated while a housetype approach does not necessarily reflect the size/value of the house. On balance, the MIR preferred approach based on bedrooms is supported which would reflect existing guidance for education contributions.</p> <p>Iceni Projects c/o Balfour Beatty Homes and Mactaggart & Mickel Homes- Disagree with both options. Proposed developer contributions should be based on Planning Circular 3/2012.</p> <p>Persimmon Homes - Some house builders, such as Persimmon, build smaller more affordable homes which generate higher density developments compared to other typical housing developments. Given that there are more homes on-site the developments are more resource efficient and generate more affordable homes. Policies that are based on bedroom numbers are therefore prohibitive given that the cost is passed to the purchaser through the house price which, given that it is a smaller unit, is a higher proportion of the cost of the new home compared to larger homes that may have the same number of bedrooms. It is therefore suggested that the average house size (floor area) within East Dunbartonshire is identified and where appropriate the average size of private unit within a development (including garages to allow for conversion potential) is then compared to this and the contribution increased/decreased as appropriate.</p> <p>Homes for Scotland - The Preferred Option proposes to make developer contributions proportionate to the number of bedrooms in a house. The Reasonable Alternative Option would base calculations on the type of house or floorspace. Homes for Scotland would be happy to discuss both of these options further with the Council, but we cannot endorse either option at this time as further detail and clarification is required.</p> <p>In further defining its approach, we would encourage the Council to be especially mindful of the need to support small-scale homebuilders. In line with the recommendations of our recent report, we advocate the use of planning policy to ensure the builders of sites of 12 or fewer homes are not asked for developer contributions, and that sites of 13-25 homes have reduced contribution asks. Viability and flexibility are, of course, essential considerations for any developer contributions policy.</p> <p>Iceni Projects (For Balfour Beatty Homes and Mactaggart & Mickel Homes – Crofthead 1&2, Bishopbriggs)</p> <p>Our client cannot accept either of the approaches advocated for this issue. Any proposed developer contributions policy must comply with Planning Circular 3/2012: Planning obligations and good neighbour agreements. It is of concern that there is no reference in Issue 37 to this Circular, given this should form the basis of any new policy on developer contributions in LDP2. The general policy requirement for this is as follows:-</p> <ul style="list-style-type: none"> • necessary to make the proposed development acceptable in planning terms; • serve a planning purpose and, where it is possible to identify infrastructure provision requirements in advance, should relate to development plans; • relate to the proposed development either as a direct consequence of the development or arising from the cumulative impact of development in the area; • fairly and reasonably relate in scale and kind to the proposed development; • be reasonable in all other respects. <p>On this basis, there should be another reasonable alternative in this Issue referring to Circular 3/2012 in respect of any developer contribution policy.</p>	

Community Area/Policy Theme	How can we address housing need in the right location?
Planning Authority response	
<p>The Proposed Plan has been prepared taking into account the responses received on the following issues.</p> <p>Issue 33 – How can new development ensure that the types and variety of new housing built in the area meets the broad needs of the community in a holistic manner?</p> <p>A number of respondents, particularly individuals and interest groups (including some key agencies), supported the preferred option. Whilst the development industry seemed to largely agree with the overall aim that the issue was seeking to achieve, most supported the alternative option of retaining the existing wording and leaving the site mix and other matters to be dealt with on a case by case basis. Some site promoters stated that restrictive standards would risk the viability of new development, distort market demand and reduce the pace of delivery. Some site promoters also stated that the setting of technical standards is best delivered through Building Standards regulations.</p> <p><i>Conclusion: Implement preferred option (subject to further investigation on the possible use of quotas)</i></p> <p>Issue 34 – Does the Housing Land Requirement in the approved SDP and LHS require amending for LDP2?</p> <p>Whilst only a limited number of individuals commented on this issue directly, as the preferred option for the Housing Land Requirement has translated into the approach to allocations within each of the community areas, and the responses from the community across East Dunbartonshire were overwhelmingly supportive of the preferred option to avoid the release of greenfield land. Please see Issues 3, 11, 17, 21, 25, 28 and 30 for further information on the responses and points raised within each community. The preferred option for housing land was also supported by some key agencies.</p> <p>The development industry overwhelmingly disagreed with the preferred option for housing land; the main points of objection can be summarised as follows:</p> <ol style="list-style-type: none"> 1. The preferred option is short-sighted, overly conservative and does not provide a generous allocation of new housing land as required by Scottish Planning Policy (SPP). The preferred option fails to plan for the long-term and will facilitate a decline in new completions beyond the current 5 year Housing Land Audit programming period, which will subsequently lead to a declining population and impact on local services. 2. Alternative Option (3) in the Monitoring Statement is supported subject to the proposed amendments (see points 3 and 4 below). This is the only option provided that would maintain current completion rates, provide a generous housing supply and meet the requirements of SPP. 3. The Council’s approach for adding generosity to the Housing Land Requirement is contrary to the adopted Clydeplan Strategic Development Plan (SDP) and SPP. The Council has subtracted housing completions before calculating the 15% generosity which has superficially reduced the Housing Land Requirement. 4. The Housing Needs and Demand Assessment (HNDA) upon which the preferred option is based, utilises out of date information from 2012. However, more recent household projections from National Records of Scotland, that are based upon 2016 data, show that there will be a significant increase in the number households in East Dunbartonshire over the period that LDP2 will cover. Therefore, the preferred option will not meet future housing needs and demands in East Dunbartonshire which in turn will negatively impact upon housing affordability. 	

Community Area/Policy Theme	How can we address housing need in the right location?
<p>5. Policy 8 of the SDP requires the Housing Land Requirement to be met at the both Local Authority and Housing Market Sub Area (HMSA) level. The preferred option in the MIR does not set out the Housing Land Requirement by HMSA and is therefore contrary to the adopted SDP. There is a significant shortfall in the Greater Glasgow North West HMSA (which includes Bearsden and Milngavie combined with Clydebank and the north west of Glasgow) and additional land must be allocated in LDP2 for housing to off-set this shortfall.</p> <p>6. Only one of the sites within the MIR preferred option has been promoted by a recognised house-builder and the deliverability of these sites is questioned.</p> <p>7. Several developers/ site proposers expressed support for the approach devised by Homes for Scotland (the industry body for house-builders).</p> <p>Further information on the Council’s approach to Housing Land Supply and a detailed response to the points raised by the development industry is provided in the Housing Background Report which has been published alongside the Proposed Plan.</p> <p><i>Conclusion: Implement preferred option</i></p> <p>Issue 35 – Should LDP2 include specific measures to address the ageing population and how should this be done?</p> <p>Individual respondents tended to support the preferred option and wished to see more housing for older people to be built in the area. However, some respondents stated that people of all ages, particularly younger people, struggle to meet their housing needs and that other groups should be considered too. As with Issue 33 above some within the development industry agreed with the principle of meeting the housing needs of older people but most did not support either the preferred or alternative options and stated that the type of housing built should be left to the market. Some of these respondents referred to the new provisions in the Planning (Scotland) Act 2019 regarding the needs of older and disabled persons and stated that the Council should wait until further guidance has been produced by the Scottish Government. Respondents for this question acknowledged that the older peoples and specialist housing study was ongoing and that the options were subject to further work.</p> <p><i>Conclusion: Implement combination of preferred option, alternative option and new measures reflecting the results of the older peoples and specialist housing study.</i></p> <p>Issue 36 – How can the developer contributions policy in the LDP be improved to provide greater detail and clarity on when contributions will be required and how they will be spent?</p> <p>The vast majority of respondents support the preferred option to provide greater detail and clarity within LDP policy to reflect the removal of statutory status for guidance by the Planning (Scotland) Act 2019. There was particular support from individuals and relevant groups/ agencies for setting out requirements for healthcare contributions clearly in the LDP; however this was not universally supported by housing developers. There was also specific support for requiring contributions towards active travel and public transport infrastructure.</p> <p><i>Conclusion: Implement preferred option</i></p> <p>Issue 37 – How can the LDP ensure that the cost of developer contributions is proportionate to the scale and type of housing development?</p>	

Community Area/Policy Theme	How can we address housing need in the right location?
<p>Responses to this issue largely only came from the development industry, with the exception of one Community Council. Whilst there seemed to be a general consensus on making developer contributions proportionate, opinion on how this would best be achieved was divided between the preferred MIR option and the alternative option. Additionally, some respondents stated that LDP policy should default to the position in Planning Circular 3/2012: Planning Obligations and Good Neighbour Agreements instead of either of the options presented. Those that supported the alternative option all sought differing alternative methods to be used, and as the policy will be prepared in accordance with Planning Circular 3/2012, it is therefore considered that the preferred option is the most appropriate approach to take forward in the LDP.</p> <p><i>Conclusion: Implement preferred option</i></p> <p>The Proposed Plan is subject to consultation, with all representations being considered by a Reporter on behalf of Scottish Ministers. This provides a final opportunity for comments.</p>	

How can we create vibrant and successful Town Centres?

Community Area/Policy Theme	How can we create vibrant and successful Town Centres?									
Elements of the engagement included:	<ul style="list-style-type: none"> • Online Questionnaire • Drop-In sessions • Emails 									
List of Organisation(s) commenting on this topic										
<ul style="list-style-type: none"> • Avison Young c/o Aldi Stores • East Dunbartonshire Visually Impaired People's Forum • Go Bike • Milngavie Community Council • National Federation of the Blind UK • Strathclyde Partnership for Transport (SPT) 										
Planning authority's summary of the representation(s):										
<p><u>Issue 38 – How can LDP 2 ensure that town centres contribute to improved health and wellbeing of local communities?</u></p>										
<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>									
<p>1. Create a new policy that includes a presumption against particular town centre uses, particularly those that can lead to poor health and negative social outcomes.</p>	<p>2. Include specific thresholds, potentially through a percentage limit, for types of uses within town centres that do not contribute positively to health and wellbeing.</p>									
<div style="text-align: center;">  <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Response</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>agree with preferred option</td> <td>92%</td> </tr> <tr> <td>agree with alternative option</td> <td>6%</td> </tr> <tr> <td>don't know/neither</td> <td>2%</td> </tr> </tbody> </table> </div>			Response	Percentage	agree with preferred option	92%	agree with alternative option	6%	don't know/neither	2%
Response	Percentage									
agree with preferred option	92%									
agree with alternative option	6%									
don't know/neither	2%									
<p>Agree with preferred option – 45 Agree with alternative option – 1 Other / Don't Know – 3</p>										
<p><i>Summary of comments from individuals:</i></p>										

There was widespread support for the preferred option. This question generated a large number of suggestions and recommendations on how to improve health and wellbeing. Many comments focused on how to improve town centres in a general sense, as opposed to the health and wellbeing of local communities. These are summarised below, first by general points and then for each respective community area.

General

- There should be control over choice of shops in town centres and an effort to reduce inequality
- There is now over-provision of new supermarkets and this is unsustainable in commercial sense.
- More town centre provisions only possible with better/more parking
- The strategies protect long term economic and environmental benefits
- Retail jobs are under threat from online shopping and larger supermarkets
- Better active travel options in town centres will encourage more people to use them

Bearsden

- Should reinstate free parking for at least 1 hour to support local businesses
- Need better public transport
- Need taxi rank to help people who do not drive
- The preferred option to only support healthy uses in town centres is aspirational and in practice any viable business should be supported
- Need more public toilets
- Better connections with surrounding residential areas
- Need a zebra crossing from M&S side of street to the Hub.
- New Kilpatrick Church car park should be included in the town centre boundary
- Housing should be encouraged in the town centre

Bishopbriggs

- Disagree that policy on retail park should be relaxed. This would damage the town centre further. The focus should remain on comparison retail.
- Council should relax policy on retail uses to reduce number of vacancies
- Agree with integrating the strategy actions into the Plan
- Don't agree that reduce number of unhealthy shop types will have an impact
- Improve active travel network

Kirkintilloch, Lenzie and Waterside

- Reinstatement free parking for at least 1 hour to support local businesses
- Millersneuk shopping centre should be upgraded as with main part of Lenzie
- It is better to have fast food takeaways and betting shops etc than vacant units
- Rent and rates for shops should be reduced to encourage better range of retailers
- The main street in Kirkintilloch is difficult to cross safely

Milngavie

- Reinstatement free parking for at least 1 hour to support local businesses
- Town centre occupancy should be encouraged above all other development
- Business rates too high. Need to stop raising them.
- Should improve access for cyclists and e-cycle access

Lennoxton and MoC

- Agree that unhealthy uses should be restricted

Torrance

- Lack of shop types in Torrance village centre
- Town centres should have free parking for at least 1 hour
- Enhanced public realm, pavements etc required.
- Council should provide incentive to use vacant units

Twechar

- No comments received

Summary of responses from groups and organisations:

Go Bike - If the Council pursues active and public transport as the main modes of transport for accessing town centres, rather than the private car, then, as studies have shown, footfall will increase. "Designing Streets" assists this strategy to reinvigorate town centres as places where people walk, cycle and meet people, rather than places where pedestrians struggle to walk when faced with car drivers searching for somewhere to park their car. People who cycle, walk or use the bus are less likely to support fast-food outlets than those who are sedentary in their cars, but at least, if they do frequent them, they are more likely to burn off the spare calories.

Milngavie Community Council – Agree with preferred option

SPT – Agree with the preferred option. The approach to developer contributions will provide greater certainty to developers and communities around what is expected from development. The more proportionate approach should support a range of development types. Developer contribution policy should include public transport infrastructure and services.

East Dunbartonshire Visually Impaired People's Forum & National Federation of the Blind UK - Agree with the preferred option to seek to control land uses for which there is hard evidence of poor health or negative social outcomes in town centres. However, the council also ought to be concerned that shared space street design has negative outcomes when blind, visually, hearing and mobility impaired people, and people with dementia, learning difficulties and neuro sensitive conditions amongst others, are excluded or unable to use the streets independently by such shared space designs.

There should be a similar presumption against street designs where people have to share street space with motorists, buses or cyclists.

Suggest the following modification to the Council's preferred option, as another alternative option:

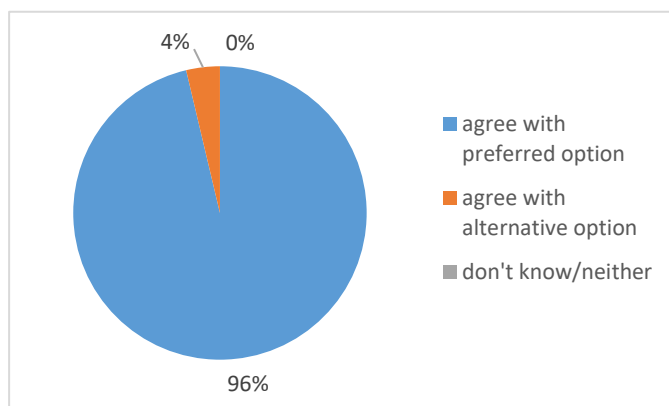
"1. Create a new policy that includes a presumption against particular town centre uses, particularly those that can lead to poor health and negative social outcomes; and against street designs where people have to share space on pavements or paths with motorists, buses or cyclists without road-edge kerbs, dropped kerb crossings, and signal-controlled crossings".

Additional reason:

- A presumption against shared space street design would respect the clear evidence accepted by the UK Select Committee on Women and Equalities in its House Of Commons Report HC 631 dated April 2017 - and on which the Scottish Government is to base new national street design guidance – that many disabled people find these designs to be inaccessible, unsafe and discriminatory.

Issue 39 - Should LDP 2 reflect the relatively low capacity for new retail development within East Dunbartonshire?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. State within the policy that there will be a presumption against significant new convenience retail floorspace	2. Retain existing approach based on individual retail impact assessments and the sequential approach



Agree with preferred option – 26
 Agree with alternative option – 1
 Other / Don't Know – 0

Summary of comments from individuals:

The Council received a relatively small number of responses from individuals on this issue. One response disagreed with preferred option on the basis that large-scale retailers will not locate to the traditional town centres in EDC, given the constraints on retail unit size.

Summary of responses from groups and organisations:

Avison Young c/o Aldi Stores - Strongly considers that the adoption of the reasonable alternative option which retains the existing approach, based on individual impact assessments and the sequential approach, would be more welcome. This would allow for a more flexible approach and the planning authority would still be able to request retail impact assessments to fully consider the impacts of proposed developments on established centres. The preferred option would be anti-competitive and limit new operators entering the market, reducing choice and value. Considers that the preferred option is not supported by the Council's Retail Capacity Assessment 2019.

Milngavie Community Council – Agree with preferred option

Planning Authority response

The Proposed Plan has been prepared taking into account the responses received on the following issues.

Issue 38 – How can LDP 2 ensure that town centres contribute to improved health and wellbeing of local communities?

The Council notes that there is overwhelming support for the preferred option, and that there were a wide range of suggestions on how to improve town centres, both generally and for specific centres. These will be considered as part of the drafting of the Proposed Plan.

Conclusion: Implement preferred option

Issue 39 - Should LDP 2 reflect the relatively low capacity for new retail development within East Dunbartonshire?

The Council agrees that it is important to maintain a flexible approach and that the development plan should accommodate future changes in the rapidly changing retail sector. In order provide an appropriate policy framework for this, it considered that the current policy, which is based on individual retail impact assessments and the sequential approach, needs strengthening. It is considered that this can best be achieved by widening the sequential approach and placing greater focus on the *town centres first approach*, with retail capacities set out within the individual 'Community Policy' sections. This will ensure that the health of our town centres continue to be protected while at the same time encouraging and supporting any improvements in the range and quality of any new retail floorspace proposals.

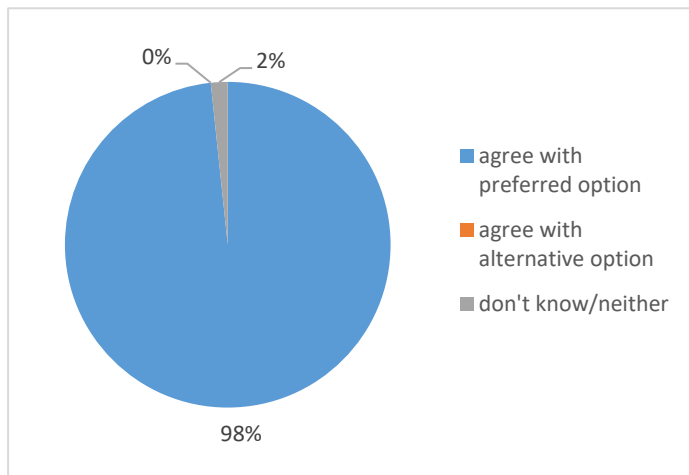
Conclusion: Implement preferred option

The Proposed Plan is subject to consultation with all representations being considered by a Reporter on behalf of Scottish Ministers, this provides a final opportunity for comments.

How can we best prepare for the impacts of climate change?

Community Area/Policy Theme	How can we best prepare for the impacts of climate change?	
Elements of the engagement included:	<ul style="list-style-type: none"> • Online Questionnaire • Drop In Sessions • Schools Event • Emails/Letters 	
List of Organisation(s) commenting on this topic		
<p>Online Questionnaire: 22 responses</p> <ul style="list-style-type: none"> • Agree with preferred options: 11 • Disagree with preferred options: 9 • Don't Know: 2 <p>Drop In Sessions:</p> <ul style="list-style-type: none"> • Agree with preferred options: 297 • Disagree with preferred options: 6 • Don't Know: n/a <p>List of Organisations</p> <ul style="list-style-type: none"> • Extinction Rebellion • Go Bike • Homes for Scotland • Kirkintilloch Community Council • Milngavie Community Council • Mosshead Resident's Association (MRA) • NHS Greater Glasgow & Clyde (NHSGCC) • Persimmon Homes • Scottish Enterprise • Scottish Environment Protection Agency (SEPA) • Scottish Forestry • Scottish Natural Heritage (SNH) • Scottish Water • Strathclyde Partnership for Transport (SPT) • Visit Scotland • Woodland Trust Scotland 		
Planning authority's summary of the representation(s):		
Issue 40 - Is a new policy required on climate change adaptation and sustainable design?		
Preferred Option	Reasonable Alternative Option	
1. Require evidence that proposals for new development have been designed to	2. Retain current policy with minor amendments	

mitigate against risks arising from climate change



Agree with preferred option – 59
Agree with alternative option – 0
Other / Don't Know – 1

Summary of comments from individuals:

There was clear support for a new policy focusing specifically on climate change, and for the importance of climate change as a key planning issue more generally. A summary of the key points raised during the consultation is set out below:

- Sustainability is essential as climate change is a real issue
- Council approach to climate change should be stronger
- Agree that a new policy is required on this to keep pace with national legislation and policy changes - there is a need to acknowledge that there is a climate emergency, as has been declared at a national level. Planning and land use play a very important role in how we mitigate and adapt to climate change.
- A new policy should also set out how East Dunbartonshire is going to reduce its emissions and get to net zero by 2045.
- We know that the climate crisis is linked with biodiversity decline and that trees are a way to address this biodiversity decline by providing habitats for a wide range of species and at the same time they can absorb carbon. The local authority could introduce an ambitious tree planting plan as part of a land use framework to ensure that the appropriate trees are in the right place and to ensure that they are integrated with other land uses.
- Future policy and action needs to focus on a) whether new developments are necessary from an environmental perspective b) if new developments are required then they are environmentally sustainable in being carbon neutral, using renewable energy and on brown field sites and c) whether mitigating factors have an effect on climate change e.g. increased use of cars; walking distances from schools; public transport links
- Agree. Support for alternative energy producers and an increase of renewable energy producers.
- All new development should include solar PV panels

- EDC must declare a climate emergency to inform planning decisions

Summary of responses from groups and organisations:

Similarly, there was overwhelming support from groups and organisations. However, Homes for Scotland did not agree that a new policy is required, stating that this issue will be addressed via the forthcoming NPF 4.

Homes for Scotland - The current Programme for Government makes it very clear that the Climate Emergency will be a lead consideration in developing the policies that will form NPF4. Because NPF4 policies will be applicable to planning decisions in every part of Scotland, Homes for Scotland does not consider it necessary for this LDP to include a new policy on climate change adaptation and sustainable design. Local authorities, like other stakeholders, are involved in the collaborative process of preparing NPF4, and draft policies are programmed to be published in September 2020.

We would not object to the use of a simple form checklist to communicate the environmental credentials of a proposed development that are in place by virtue of existing policy and regulatory requirements or through developer choice.

Milngavie Community Council – Agree with preferred option, which provides a stronger policy framework for ensuring that developments are resilient to the effects of climate change

Kirkintilloch Community Council - fully recognise and support the recent asks made by Extinction Rebellion in their letter to East Dunbartonshire Council on 11th October 2019. In particular, support commitment to carbon and waste reduction by:

- considering carbon neutral travel for all new builds/ road upgrades
- making all council buildings carbon neutral
- prioritising builders who are making eco-friendly buildings
- increasing the variety of plastic waste collected and recycled from households.

Scottish Water - Climate change and embracing the changes which are necessary to achieve a positive benefit on our environment and are integral considerations of Scottish Water’s plans and operations. In September 2019, the First Minister announced as part of the ‘Programme for Government’ that Scottish Water “would commit to becoming a net zero company by 2040 and that by 2030, it would aim to produce or host three times more renewable energy than it consumes.”

Whilst this has no direct impact on the development of sites, we recognise that such sites do have a direct impact on our journey towards reaching this target. Therefore we would encourage the development community embrace innovation to reduce their carbon footprint, which can include the amount of water consumed by new and refurbished homes and businesses and the amount of ‘runoff’ and ‘grey’ water entering the foul network. This not only preserves and increases capacity in the foul network, it also reduces the energy requirements used for transportation and treatment of both potable water and waste water discharges.

We have worked with the Scottish Government (Building Standards) in our water efficiency projects which included the introduction of Bronze, Silver and Gold ‘efficiency’ standards. This can have a direct positive impact on consumption and energy efficiency as hot water production and usage reduces.

In addition, the incorporation of ‘grey water’ capture and usage for toilet flushing and the capture or rainwater for garden usage were also trialled in projects across Scotland. Since the initiation of these projects, technology and availability of such fittings and fixtures has improved as well as a general awareness in the public of how water usage impacts on our environment.

For sustainability and to protect our customers from potential future sewer flooding, we will not normally accept any surface water connections into our combined sewer system. To avoid costs and delays, where a surface water discharge to our combined sewer system is anticipated, the developer should contact us as soon as possible prior to making a connection request, with strong evidence to support the intended drainage plan. The policy can be found at:

<https://www.scottishwater.co.uk/en/Business-and-Developers/Connecting-to-Our-Network/Pre-Development-Information/Surface-Water-Policy>

If East Dunbartonshire or Developers have any such innovations or proposals in relation to supporting the use of heat networks which they think Scottish Water may have some input into, we will be more than happy to discuss these in further detail.

SEPA - Whilst we are strongly supportive of LDP2 addressing climate change, we are not sure that simply requiring major developments to include a Sustainability & Energy Statement will improve standards. Is it intended to refuse planning permission for those developments which submit an unambitious Statement? Is it intended to set out certain standards e.g. Gold or Bronze Standard for certain parameters e.g. water usage? What encouragement will there be for developers to implement more sustainable measures? We are not convinced that a policy that simply requires a Statement will be effective in raising standards and we consider there will be a risk that the Statement will be regarded as an expensive tick box exercise.

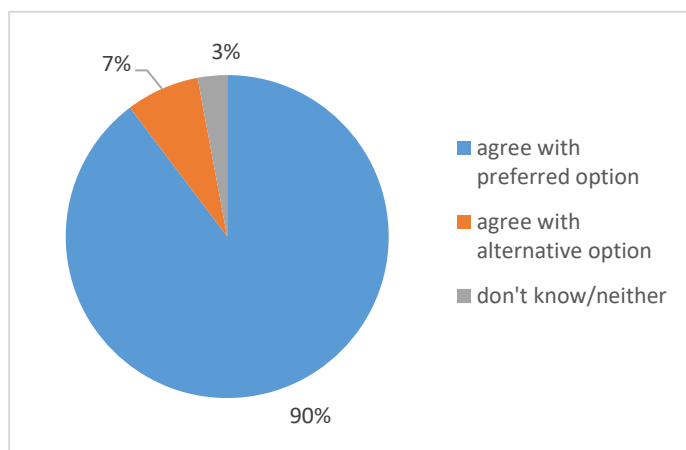
SPT – Agree with the preferred option. The preferred options support an increased focus on climate change mitigation and adaptation.

SNH - Agree with the preferred option.

NHS Greater Glasgow & Clyde (NHSGCC) - NHSGGC support the options in relation to the impacts of climate change.

Issue 41 - How can new development protect biodiversity more effectively?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Ensure no net loss of biodiversity	2. Protect, enhance and maintain general nature conservation 3. Ensure a measurable net gain for biodiversity



Agree with preferred option – 61
Agree with alternative option – 5
Other / Don't Know – 2

Summary of comments from individuals:

Whilst there was strong support for the preferred option and the principle of protecting biodiversity, a number of responses expressed a preference for requiring net gain (alternative option 3).

- Important to preserve the green belt to maintain biodiversity
- Not net loss of biodiversity is not good enough. Biodiversity gain is optimum.
- I disagree with the Preferred Option. Reasonable Alternative No 3 is the best for East Dunbartonshire. Options 1 and 2 do not go far enough to prevent loss of biodiversity. East Dunbartonshire needs to not only protect biodiversity but actively work towards biodiversity gain and ensure that habitats are carefully managed in the long-term.
- New Plan should address the negative impact on biodiversity caused by house building
- Important for wildlife corridors to be maintained and created
- Improve water quality to increase wildlife and biodiversity
- Tree planting would help to tackle climate change

Summary of responses from groups and organisations:

Responses on this issue were mixed. Whilst there was support for the preferred option, others – including the Woodland Trust, Milngavie Community Council and SEPA - felt it does not go far enough and supported option 3. Conversely, Persimmon Homes and Homes for Scotland expressed concerns about all options and suggested that the current policy should be retained.

Scottish Forestry – Issue 41 does not address how woodland loss as a result of development will be addressed. It makes no reference to the SG *Control of Woodland Removal Policy* or the Clydeplan *Forest and Woodland Strategy* at the very least. We are unable to determine which option should be supported as it provides no context to what is classed as "a last resort" or what the "mitigation hierarchy" will be.

Woodland Trust Scotland - Biodiversity net gain should also be a requirement for new development. Any policy on this should acknowledge that loss of ancient woodland and other irreplaceable habitats should not be part of the compensation discussions, as these habitats cannot be replaced by any amount of compensation. Therefore, provisions must be made for the protection of ancient woodland, which supports a high amount of biodiversity. Ancient and veteran trees should also be given the same level of protection.

Milngavie Community Council – Agree with alternative option 3, which has the potential to significantly enhance the environment in and around development sites.

Kirkintilloch Community Council – Support protecting biodiversity by:

- a concentrated effort for tree planting and direct consequence for those who cut down trees without permission
- planting wild flowers in council owned green spaces rather than lawns
- saving green belt areas and regenerating brown sites for building.

Persimmon Homes - We agree that there is a need to minimise the impact of development on biodiversity. It is not however appropriate to state under the preferred option that developments must "ensure no net loss of biodiversity". There may be instances where this is not possible when all policies and material considerations have been considered in full. The preferred option is therefore too prescriptive. Furthermore, it is not clear at this stage how a net gain or loss would be calculated. Would it be that one

species is ranked higher than another?

Homes for Scotland - As Scottish Planning Policy indicates, the consideration of development proposals requires the balancing of various, sometimes competing objectives. We therefore do not consider it appropriate for planning policies to be as prescriptive as the Preferred Option and Alternative Option 3. We also question exactly how one would define a net gain or a neutral impact on biodiversity. It should also be recognised that Housing developments with gardens and open space are usually more bio-diverse than agricultural fields.

Homes for Scotland considers that it is most appropriate for the Council to retain its current LDP policy on biodiversity. There are risks that a rigid policy requiring a net gain from all or some developments would unintentionally frustrate the delivery of sustainable development in some circumstances. The Scottish Parliament, probably for this reason, chose not to make Net Biodiversity Gain a requirement of the new Planning (Scotland) Act 2019 – having considered but voted down an amendment tabled by Graham Simpson.

Go Bike - All housing developments must have sustainable drainage systems to support biodiversity.

SEPA - We support Option 3, Ensure a measurable net gain for biodiversity. Given that environmental enhancement is usually low cost and yet has well-recognised wider benefits including health benefits and enhanced value of development, it would seem reasonable to adopt this approach.

Regarding the Preferred Option, we note that this option introduces a mitigation hierarchy. The wording of the policy would be critical in that it should be ensured that the mitigation hierarchy does not simply result in all sites being considered developable. The first principle should be to locate a site where biodiversity impacts can be avoided. If the wording of the policy is not carefully constructed, it would be possible for sites of recognised value to be developed with the promise that losses could be offset in some form at some other site. The principle should be that the development should work with the site, making places that are good for people and the environment.

One important mechanism for achieving biodiversity gain is designing drainage measures from the outset to contribute to biodiversity, amenity and provide links in blue/green infrastructure. This could be usefully incorporated in the approach.

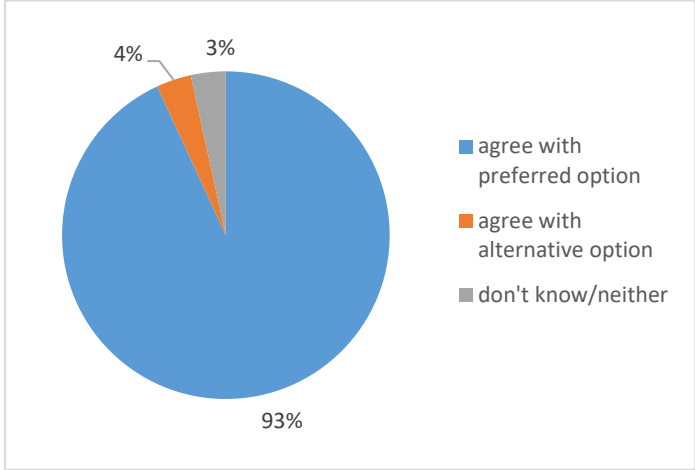
SPT – Agree with the preferred option. The preferred options support an increased focus on climate change mitigation and adaptation.

SNH - We support in principle the preferred option.

The way in which LDP2 can best ensure that new development protects biodiversity more effectively is by setting out as clearly and unambiguously as possible what biodiversity information (particularly protected species surveys) needs to be submitted with planning applications. This requires proper/detailed surveys undertaken to appropriate methods and at the correct times of year that confirm whether protected species actually use the site or not. It must be clear beyond any doubt what the species survey requirements are and therefore be clearly set out in the policy of the LDP itself requiring developers to undertake and submit the relevant/necessary surveys.

Issue 42 - Can the policy be strengthened to ensure that active travel infrastructure is integrated into development?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Strengthen the policy to ensure all new developments provide high quality active travel infrastructure.	2. Maintain current policy wording and work with developers on a case by case basis



Agree with preferred option – 54
 Agree with alternative option – 2
 Other / Don't Know – 2

Summary of comments from individuals:

There was overwhelming support for the strengthening of our active travel policy, an increase in active travel infrastructure & sustainable transport, a reduction in car parking spaces for new homes as well as concerns about the impact of road traffic in general. Comment suggested that bus and rail links should also be prioritised and that LDP2 must be aligned with the Local Transport Strategy to help address the climate emergency. It was suggested that cycling should be promoted throughout the whole of East Dunbartonshire, not just the A81.

Summary of responses from groups and organisations:

There was clear support for the preferred option from the majority of groups and organisations, however, Homes for Scotland expressed a desire to see the current approach retained.

SPT – Agree with the preferred option. Suggest that in addition to high quality active travel infrastructure, access to existing public transport network should also be reflected to further reduce the risk of new development generating trips by private vehicle.

Kirkintilloch CC - Significant progress is being made in relation to community aspirations and travel in the town. The community has already produced comment for the EDC Transport Strategy 2020 to 2025 and it is important this is also fed into the new Local Development Plan. Of particular note:

- Focusing on reducing cars in town centre. People clearly wish to see a reduction in cars in the town. This has particular relevance to undertaking traffic management and consideration of options in relation to parking. A differentiated parking plan with long-stay/short-stay options should be investigated, to include out of town parking and Park and Ride should these be deemed appropriate.

- Speed restrictions should be enforced (particularly utilising new 20mph legislation on Cowgate and residential areas) and development of traffic free schools should be examined.
- Kirkintilloch has been deemed a pilot ‘active travel town’ in the new Transport Strategy. Delivery of this though is key and a request has been lodged to detail activity in 2020 to deliver this. Whatever the activity is though may have a bearing on the new Local Development Plan, and cognisance should therefore be taken to this piece of work.
- Part of reducing traffic in the town, improving accessibility and reducing isolation requires enhancing bus routes. Work should be undertaken with the community to understand exactly what is required, and then further work with partners to deliver this.
- Environmentally friendly transport aspirations – these have been covered under the section on Travel above but in essence relate to reducing traffic and enhancing active travel opportunities.

Milngavie Community Council – Agree with preferred option

Mosshead Resident’s Association - Support active travel to help reduce local traffic and improve air quality. However, it is better to develop active travel routes away from main roads including safe routes to and from schools. For these reasons do not support extension of Bearsway on A81.

Homes for Scotland - It is not clear to Homes for Scotland that the current active travel policies are in any way deficient. There are numerous references in the current LDP to active travel which appear to relate well to current Scottish Planning Policy and Guidance.

It appears that the Preferred Option is directed at achieving stronger and more effective links with developer contributions guidance. Homes for Scotland support the expression of detailed justification for developer contributions but would object to any requirements that requires works or contributions which are either unrelated or disproportionate to the proposed development. The current LDP policy would support related and proportionate contributions so we see no reason to move away from that approach.

Go Bike - Significant action must be taken to transfer people from the private car to public and active travel. This may well involve re-regulation of buses and moves to limit the use of the private car in town centres.

SEPA - support the Preferred Option.

SNH - Yes. We support the preferred option. Development should include an integrated active travel approach as part of a design led approach to new development.

Issue 43 - How can LDP2 deliver infrastructure for electric vehicles?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. A requirement for charging points in all new development	2. A requirement for charging points in non-residential developments (e.g. retail, business, etc).

Summary of comments from individuals:

Generally there was overall support for the preferred option. Comments received stated that there should be an ambitious policy on electric vehicle charging points for new development and that the Council should also add more points onto the public charging network and make the Council fleet all-electric. However, some comments did disagree with the preferred option saying this policy was unnecessary as electric vehicles can be charged from standard sockets or privately installed chargers. It was also stated that electric vehicles can be beneficial but are not the complete solution to the transport problems in the area.

Summary of responses from groups and organisations:

Overall there was a mix of views on the benefits of the preferred option of having planning policy requiring electric vehicle charging infrastructure in new development.

SPT – Agree with the preferred option. This is very much supported. EV charging points must be available at home locations as well destinations, and non-residential development to support the move towards an electric vehicle fleet. It also provides certainty in relation to the requirement.

Milngavie Community Council – Agree with preferred option

Persimmon Homes - We agree that provision needs to be made for Electric Vehicles in future developments; however rather than providing an electric car charging point for each home we suggest passive provision to future proof for potential EV installations especially when the technology is evolving and other technologies, such as hydrogen, are being explored. Passive provision generally means providing ducting between the fuse box and space whilst ensuring that the fuse box has capacity for the connection and the appropriate switches to control use of the EV charging point, if installed. This approach would enable easy installation of electric charging points at a future date, or during the development process itself, should this be required. It also reduces the cost associated with the development (which would be passed onto the purchaser) and ensures that the homeowner has the choice alongside active travel and public travel options.

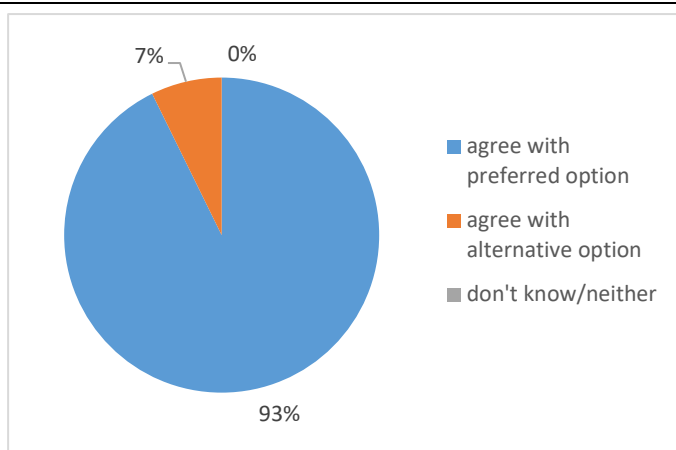
Homes for Scotland - We do not believe there is enough evidence in place at this time to demonstrate that a planning policy requirement for electric vehicle charging points in all homes would be either proportionate or beneficial. At this time, we believe it is right to leave this to developer choice. The preparation of NPF4 will provide an opportunity for Scotland’s many planning stakeholders to debate the extent to which planning policy can beneficially reflect our changing attitudes to energy and fuel consumption.

Go Bike - While there is a place for electric vehicles, particularly for public transport, emergency vehicles, refuse lorries etc, the use of the private car must be limited. Electric cars do reduce, but do not eliminate, pollution and without control, they do nothing to reduce congestion.

SEPA - support the Preferred Option.

Issue 44 - How can the carbon footprint of new development be reduced?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Reduce greenhouse gas emissions arising from new development through the introduction of an energy hierarchy	2. Retain existing policy with minor amendment 3. Reduce GHG emissions arising from new development through a ‘towards zero carbon development’ policy



Agree with preferred option – 51

Agree with alternative option – 4

Other / Don't Know – 0

Summary of comments from individuals:

The Council received relatively few responses on this issue. Whilst there was general support for the implementation of an energy hierarchy however, a number of submissions expressed a preference for option 3.

- Financial contribution to offset carbon should be less than 30 years. It should be done BEFORE the build is complete to mitigate against developers going out of business or not holding to their commitments.
- Option 3 is preferable to the others. Financial contribution to offset carbon should be less than 30 years. It should be done BEFORE the build is complete to mitigate against developers going out of business or not holding to their commitments. I commend Option 3 on the basis that it... "Provides a very strong policy position on the importance of reducing emissions and sets out a 'zero carbon' aspiration for all development" (MIR page 121) and I note that, while this may be viewed as "difficult to implement" this option provides us with the best chance to act on a local level and contribute positively to the carbon reduction measures urgently required to deal with the Climate Emergency.
- All new development should reduce the carbon footprint and greenhouse gases
- Need to be realistic about carbon emission targets – can be unsustainable for small businesses
- New building should be minimised, priority should be renovation of existing buildings

Summary of responses from groups and organisations:

Again, there were a range of views on this issues, with no clear consensus. A number of responses raised concerns about how such a policy would be applied.

Milngavie Community Council - We support alternative option 3 for the reasons given. However, we accept that it might be difficult to implement.

Woodland Trust - This policy is limited to energy use. Construction materials also have a role to play, for example timber should be used as a high quality construction material. Travel distances should be reduced and public transport connections should be widely available and convenient to use for new housing developments for example.

Persimmon Homes - Many house builders already address criteria 1 of Option 1 where energy requirements are reduced through the adoption of a fabric first approach whilst the now generally standard use of solar

panels ensures that the second criteria of incorporating renewable energy sources is also met. Incorporating low-carbon energy sources on the scale required across the country is not however feasible. This criteria seeks to incorporate electrical space & water heating from either Air Source Heat Pumps or Ground Source Heat Pumps. The pump market is not however capable of delivering the number of pumps that would be required. In 2018 only 22,000 pumps were produced for the whole of the UK. In addition to the lack of products there would not be sufficient engineers to design, install and commission the equipment which could delay the delivery of new homes. The electrical grid may also need to be upgraded to accommodate the use of this equipment with the cost being passed onto house purchasers.

We support the updating of the existing policy (Option 2) regarding carbon savings where the carbon emissions target will be increased to 20% through the use of low and zero carbon generating technologies. Where this cannot be achieved there could be a carbon offset fund. Should the Council wish to explore the latter further we would welcome detail of the potential cost per tonne of CO².

Homes for Scotland - The Preferred Option proposes the introduction of an Energy Hierarchy. We are not clear how this hierarchy is to be applied, so it is not possible to provide an informed response.

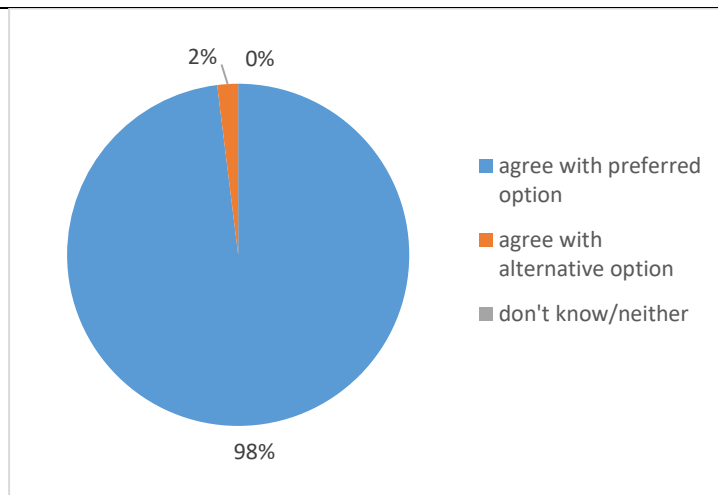
Homes for Scotland does not, as a general rule, support the use of planning policy to require home builders (or other developers) to exceed building standards requirements on carbon emissions.

We note the fact that NPF4 will look to provide a planning response to the Climate Emergency and our view is that a pan-Scotland approach is the right one.

SEPA - We again question the effectiveness of requiring a Sustainability & Energy Statement without linking it to standards to meet, or incentives to implement more sustainable measures. In this regard, we support Option 3 which seems more in keeping with the measures needed given growing concern over climate change.

Issue 45 - How can LDP2 better support the development of heat networks and/or energy centres?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Include new policy wording that supports the development of heat networks, making use of heat generated from large buildings such as hospitals, schools and leisure centres.	2. Retain existing policy approach and wording



Agree with preferred option – 50
 Agree with alternative option – 1
 Other / Don't Know – 0

Summary of comments from individuals:

The Council did not receive a significant number of responses for this issue.

- The first option should always be to look at renewables. Ground source heating should be considered.
- I disagree with both options. The policy should always be to look at renewables first and foremost. Ground source heating should be considered.
- All waste should be incinerated to produce energy (no landfill)

Summary of responses from groups and organisations:

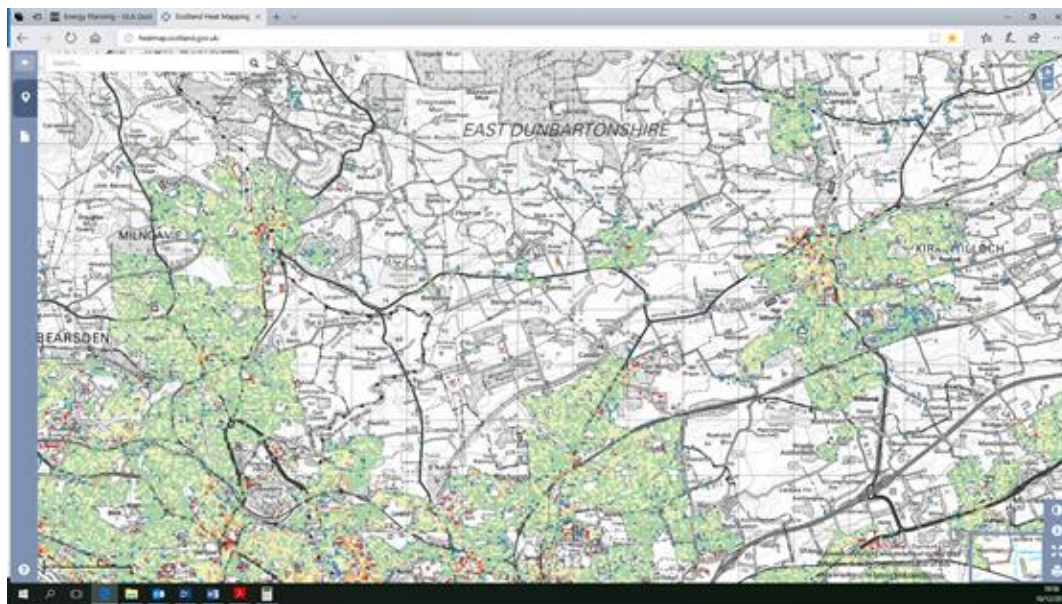
Milngavie Community Council – Agree with preferred option

Kirkintilloch Community Council – Support Community Energy Generation - develop options alongside the community for renewable energy generation with money to be re-used back into the community e.g. hydro generation at River Kelvin/Glazert confluence. Carbon neutral by 2030 – develop a programme of activity in line with above to clearly demonstrate a ‘carbon neutral’ Kirkintilloch by 2030.

Persimmon Homes - The provision of a heat network is one of a range of energy solutions that can be considered to address the need to reduce carbon emissions. Other solutions are available and include high efficiency hybrid boiler systems, solar photovoltaic panels and for housing sustainable methods of construction, including timber kit, as well as the most obvious method which is to reduce energy demand in the first place through the provision of energy efficient housing. The solution proposed in each case will vary based on the type and location of development proposed along with the cost and efficiency of low carbon technology which continues to evolve.

As part of a wider programme, work is ongoing across Scotland to investigate and identify the projects and areas where district heating would gain most benefit and be the most technically suitable and commercially viable. Heat Maps illustrate heat demand and supply opportunities and are useful tools in showing concentrations of where heat demand exists and the general heat density. It broadly informs where heat networks could be possible through potential connections or co-location between heat providers and high heat demand users. The general guidance for users of the heat map is that areas with high heat density are more likely to be feasible for District Heating.

The Heat Map below from Scotland Heat Map demonstrates where major energy loads are located in East Dunbartonshire. It is clear that whilst the energy loads in town centres are higher they are generated by a range of existing disparate sources. It is generally recognised that successful schemes need a mix of uses, anchor developments and high heat demand. East Dunbartonshire lacks the big anchor developments, such as a shopping centre to make a dedicated heat network viable. Furthermore, the preferred option seeks to demonstrate how a development could be connected to a heat network in the future where an immediate connection is not possible. In developments where there will be a range of owners, such as a housing development, it would be unreasonable to attach this requirement. It would be an undue cost to retrofit a solution at a later date and is proven only to work when installed from the outset in high density residential developments.



Combined Heat and Power (CHP) is included in the Heat Hierarchy and as such needs consideration similar to District Heating. In brief a CHP system works as follows;

- A boiler consumes a primary fuel, typically gas or biomass, producing high pressure steam which in turn is used to power a turbine, which in turn is connected to an electricity generator. The electricity produced can be consumed by the serviced development or exported to the National Grid.
- Heat which is given off by the turbine and the flue gasses are recovered to provide space and water heating for the serviced community.

CHP systems are appropriate for large mixed use or non-residential schemes where there is a large and constant heat load throughout the day. A comprehensive study by the Carbon Trust in 2007 (source – Introducing Combined Heat & Power, Carbon Trust 2007) confirmed that CHP schemes are only viable for developments where there is a high and constant heat demand. The heat demand for housing developments will peak in the morning and late evening for approximately 5-6 hours per day. The likely scale and low density of the development means that CHP is an unviable option. In addition to the demand for residential developments not being compatible with the require output of a CHP system the use and type of CHP systems being promoted are being reduced as the grid is being decarbonised and building regulations no longer support gas CHP. In addition to this the electrical grid may not be able to accommodate the CHP without substantial upgrading.

SEPA - We support the Preferred Option. One aspect which does not appear to be addressed, however, is the need to identify and protect land required for the heat network infrastructure.

Issue 46 - How can we reflect the emerging Food Growing Strategy in LDP2?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Provision and protection of land for community growing spaces.	2. As Option 1 above, plus requiring all new major development to contribute specifically towards community growing spaces.

There was general support for the integration of food growing sites, in alignment with the Food Growing Strategy.

Summary of comments from individuals:

- Agree with the reasonable alternative option. Require new developments to have defined and measureable targets for community growing spaces. Such spaces must be affordable.
- I disagree with the Preferred Option and agree with the Reasonable Alternative Option (2). I strongly believe that there should be a requirement for new developments to have defined and measurable targets for community growing spaces. Such spaces must be affordable.
- Agricultural land for food growing should not be used for other uses e.g. cemetery

Summary of responses from groups and organisations:

Kirkintilloch Community Council - Support commitment to a greener town – enhance opportunities for tree planting and community growing spaces by working with the community to develop opportunities in this respect.

Milngavie Community Council – Agree with preferred option

SNH - Yes. We support the preferred option for the provision and protection of land for community growing spaces. In general, we suggest that these should be located in accessible locations, close to areas of population where there is demand.

Issue 47 - Should the peat map be included within LDP 2 (rather than contained in supporting planning guidance)?

<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Include SNH peat map extract for East Dunbartonshire in LDP to identify areas with potential for deep peat and carbon rich soils.	2. Continue to refer to protection of peat in policy 8 and identify the location of peat on a case-by-case basis.

There was widespread support for the preferred option to integrate the peat map within LDP 2, however Scottish Forestry expressed a strong preference to carry out investigations on a site by site basis, whilst SEPA were in favour of a both including the mapping but also undertaking site specific investigations.

Summary of comments from individuals:

- I agree with the Preferred Option that The Peat Map should be included as part of the plan.

Summary of responses from groups and organisations:

Milngavie Community Council – Agree with preferred option

Scottish Forestry - strongly supports the Alternative Option as the SNH peat layers have already proven to have been contradictory to site by site investigation. We fully endorse individual site investigations to establish what the extent of the soil/peat layer is before approving any form development, but not the use of indicative mapping that has already been called into question by many.

SEPA - We would support both the Preferred Option and Option 2. The peat map extract should be included, but as this is not definitive on a site by site basis, then it is essential for a policy approach to protection of peat requiring peat survey and mitigation measures where peat occurs on site.

SNH - Yes. We support the preferred option. Inclusion in the Plan of the map will provide strength, clarity and certainty from the outset in the preparation and consideration of development proposals which may affect deep peat and carbon-rich soil. Given the current Climate Emergency, it is essential that peatlands and carbon-rich soils are protected from development.

General Comments

Summary of comments from individuals:

- These plans represent a small local input to improve the overall climate situation

Summary of responses from groups and organisations:

Milngavie Community Council – There should be a policy on tree planting, including grants for private land owners, as this could make a significant contribution to absorbing carbon and improving air quality.

Scottish Forestry - Page 115 - Key Facts Climate Change, This page notes key outcomes from the Climate Change Plan 2018-2032. It is also a key outcome within that Plan that Scotland aims to increase its woodland cover from 18% to 21% in support of mitigating against carbon emissions. Scottish Forestry believes that with the recent commitment by Government to increase woodland creation support by a further £5 million, that this important key fact should also be included within the facts box as peat management is not the only biological way SG aims to mitigate against climate change.

Planning Authority response

The Proposed Plan has been prepared taking into account the responses received on the following issues.

Issue 40 - Is a new policy required on climate change adaptation and sustainable design?

The Council notes that there was overwhelming support for a new policy on climate change and sustainable design, including from all key agencies and community organisations. In relation to the declaration of a climate emergency, whilst this is not a matter for the development plan, it should be noted that the Council

has addressed this issue separately. It is also noted that one response disagreed with the preferred option, on the basis that this policy area will be sufficiently addressed via NPF4. The Council disagrees with this and maintains that it is entirely appropriate for planning authorities to reinforce the importance of climate change mitigation and adaptation at a local scale, taking into account the varying needs and priorities throughout Scotland. It is therefore considered that the preferred option should be carried forward, subject to a review of the specific requirements for different scales/types of development.

Conclusion: Implement preferred option

Issue 41 - How can new development protect biodiversity more effectively?

The Council recognises the importance of protecting biodiversity. This is reflected through the site assessment process and overall spatial strategy. It is considered that the preferred option provides an appropriate level of safeguarding against any adverse impact from new development on biodiversity and the wider natural environment. It is acknowledged that some responses felt the policy should be requiring *net gain* as standard, however it is considered that this would not be proportionate given the wide range of development scales and types. Instead, any specific requirements – including net biodiversity gain – would be more appropriately addressed on a case-by-case basis.

Conclusion: Implement preferred option

Issue 42 - Can the policy be strengthened to ensure that active travel infrastructure is integrated into development?

There was overwhelming support for the preferred option from individuals and groups including SPT, local community councils, SEPA and SNH. Homes for Scotland felt the current policy was strong enough, however, given the level of support for the preferred option it is considered the most appropriate option to implement.

Conclusion: Implement preferred option

Issue 43 - How can LDP2 deliver infrastructure for electric vehicles?

There was overall support for the preferred option from individuals and groups including SPT, Milngavie Community Council and SEPA. Comments from developers and Homes for Scotland questioned the benefits and proportionality of this approach for the future. The Scottish Government are planning to phase out the need for new petrol and diesel cars by 2032 and as such, the use of electric and hybrid vehicles are expected to increase in the coming years. It is therefore important the future development takes cognisance of this and prepares for expected shift to electric vehicles.

In addition, within the Local Transport Strategy 2020-2025, the Council have committed to increasing the availability of electric vehicle charging infrastructure available to the public.

Conclusion: Implement preferred option

Issue 44 - How can the carbon footprint of new development be reduced?

This issue generated a wide range of views, with all three options being supported by at least one party. Most individual responses agreed with the preferred option, particularly the principle of a sustainability and energy statement. However, a number of responses felt that the Council should be more ambitious and that all new development (not just major developments) should be subject to net zero carbon targets. It is noted that one response outlined concerns over the feasibility of implementing certain aspects of the preferred option, and another highlighted that this issues is more appropriately addressed as a Scotland-wide policy. However, the Council maintains that the LDP framework has an important role to play in promoting and supporting the drive towards carbon reduction and the long-term national target of becoming carbon

neutral. It is acknowledged that the submission of a Sustainability and Energy Statement in itself will not be sufficient to achieve a real difference, and that the effective implementation of the energy hierarchy will be essential if the policy is to be meaningful. On balance, it is considered that the preferred option will provide a strong policy framework for reducing the carbon footprint within East Dunbartonshire, although the precise wording and criteria of the policy will be reviewed as part of the plan preparation process.

Conclusion: Implement preferred option

Issue 45 - How can LDP2 better support the development of heat networks and/or energy centres?

It is noted that there was widespread agreement of the need to provide renewable energy infrastructure and minimise carbon emissions as part of all new development. There were, however, concerns about the viability of certain types of energy infrastructure as part of residential developments (Combined Heat and Power in particular), and this will be taken into account. In terms of land required for heat infrastructure, this will be primarily addressed through the Council's Local Heat and Energy Efficiency Strategy, which the Policy will make reference to. It is considered that a variation of the preferred option remains the most appropriate policy approach.

Conclusion: Implement preferred option

Issue 46 - How can we reflect the emerging Food Growing Strategy in LDP2?

It is noted that there were concerns about the provision of community growing spaces as part of new development. However, the preferred option was overwhelmingly supported, including by Milngavie Community Council, Kirkintilloch Community Council and SNH.

Conclusion: Implement preferred option

Issue 47 - Should the peat map be included within LDP 2 (rather than contained in supporting planning guidance)?

Whilst there was broad support for the preferred option, there were also concerns about the reliability of the peat map at a site level. Taking this into account it is considered that a combination of the preferred and alternative options is the most appropriate way forward. This would ensure clarity about the overall extent of peat throughout East Dunbartonshire, but would also allow for further investigation on a case-by-case basis.

Conclusion: Policy to comprise a combination of preferred and alternative option

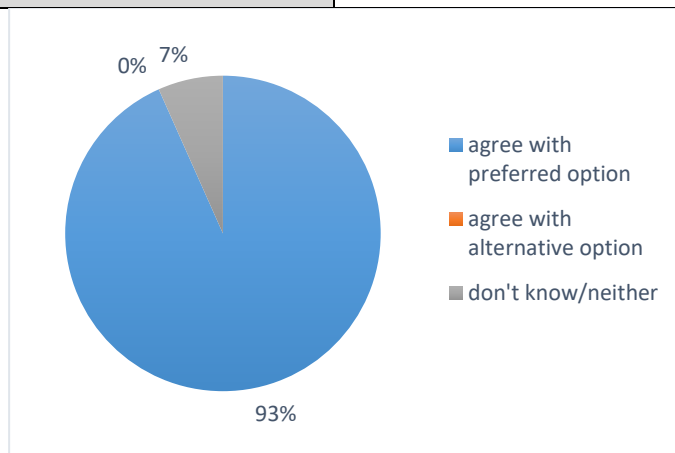
The Proposed Plan is subject to consultation, with all representations being considered by a Reporter on behalf of Scottish Ministers. This provides a final opportunity for comments.

How best can we ensure land is available for business development?

Community Area/Policy Theme	How best can we ensure land is available for business development?	
Elements of the engagement included:	<ul style="list-style-type: none"> • Questionnaire • Drop In Session • Email responses 	
List of Organisation(s) commenting on this topic		
<p>Online Questionnaire: 16 responses</p> <ul style="list-style-type: none"> • Agree with preferred options: 12 • Disagree with preferred options: 1 • Don't Know: 3 <p>List of Organisations:</p> <ul style="list-style-type: none"> • Archibald Young Ltd • Avison Young c/ Aldi Stores • Barton Wilmore for Powertek Utilities Ltd • Colliers International for Tame Construction • McEwan Hainey Planning & Development for James and Robert Rankin • Milngavie Community Council • Persimmon Homes • Profilli Partnership for AE Holdings (Waterside) Limited • Scottish Environment Protection Agency (SEPA) • Strathclyde Partnership for Transport (SPT) • Scottish Natural Heritage (SNH) 		
Planning authority's summary of comments:		
<p><u>Issue 48 – Are East Dunbartonshire's business and employment sites occupied by appropriate uses and should the definition of these sites change?</u></p>		
<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>	
1. Broaden use classes permitted on business and employment sites	2. Maintain current permitted use classes on business and employment sites.	

Community Area/Policy Theme

How best can we ensure land is available for business development?



Agree with preferred option – 14
Agree with alternative option – 0
Other / Don't Know – 1

Summary of comments from individuals:

- Concern about 'the idea of Issue 48' which 'still needs careful review' [no further comment to clarify]

Summary of responses from groups and organisations:

Archibald Young Ltd (Milton Road) - The use classes order as it stands at the moment does not accurately reflect the uses promoted by the development industry. Strict adherence to the use classes order in the development plan process is an overly restrictive approach to development planning. The Council's preferred option will likely reflect more closely the dynamics of the development industry, and importantly will help in facilitating more development and creating more jobs. Employment is of course a key driver of the economy. Employment within trade counter type uses and drive through restaurants are equally as valuable as those within traditional class 4, 5 and 6 uses.

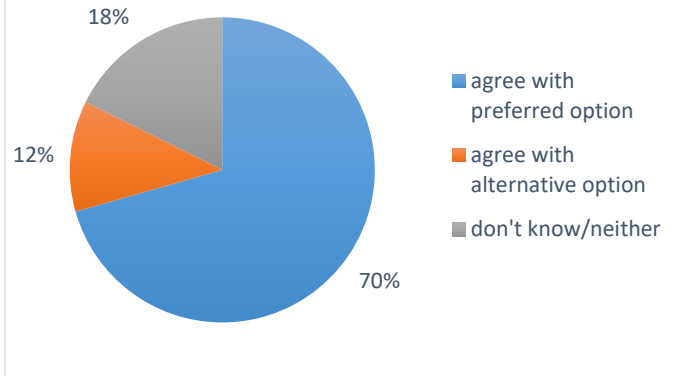
Colliers c/o Tame Construction (Kirkintilloch Gateway) - We agree that use classes permitted on business and employment sites should be broadened. We would expand this further however to include any employment generating uses so that retail could also be included in this definition. This will ensure that jobs are delivered on these sites as intended rather than sitting vacant, as the site at Woodilee has for 17 years.

Avison Young c/o Aldi Stores - Aldi are supportive of the adoption of the preferred option as it will broaden the use classes permitted on business and employment sites, by redefining 'appropriate' uses beyond the category of class 4, 5 and 6 only, to include businesses which create permanent employment but are unsuitable for a town centre location. This is a welcome approach but Aldi also feel it would be beneficial for the policy to include some provision for other alternative uses. This would be important for cases where it can be demonstrated that there is sufficient business or employment sites within the authority area, such as identified in the current policy position/reasonable alternative option. This is particularly relevant given the

Community Area/Policy Theme	How best can we ensure land is available for business development?				
<p>findings of the EDC employment land review which identifies an employment land supply of at least 14.7 years.</p> <p>Milngavie Community Council – Agree with preferred option</p> <p>Profilli Partnership for AE Holdings Limited (Waterside Bing) - This representation support’s the Preferred Option, however the alternative employment uses should be compatible with the surrounding neighbourhood and neighbouring businesses – such that the neighbouring land uses or operation and success of existing business should not be adversely affected by the new business.</p> <p>McEwan Hainey Planning & Development for James and Robert Rankin (Badenheath) - With regard to the potential development of Badenheath, strict adherence to the use classes order in terms of Use Class 6, Storage or Distribution in the development plan process is, we believe, an overly restrictive approach. The Council’s preferred option has the potential to reflect and accommodate more closely the dynamics of the development industry, and importantly will help in facilitating development and creating more jobs. Employment is of course a key driver of the economy. Employment opportunities within Class 5 General Industrial are just as valuable as those within Class 6, Storage or Distribution. In summary, we support the Council’s preferred option and would request that the permitted uses to be located on Badenheath Farm is widened to include uses which would fall within Use Class 5, General Industrial.</p> <p>SPT - Concern that this may undermine the role of town centres and sustainable travel options. Policy wording will need to be very clear around what is acceptable outwith town centres and in locations less well connected by sustainable transport</p> <p><u>Issue 49 – Should all of the currently designated business and employment sites be carried forward to LDP2 or should any be re-allocated to alternative uses?</u></p>					
<table border="1"> <thead> <tr> <th data-bbox="193 1294 798 1346"><u>Preferred Option</u></th> <th data-bbox="798 1294 1402 1346"><u>Reasonable Alternative Option</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="193 1346 798 1592"> 1. Maintain majority of business and employment sites, limited change </td> <td data-bbox="798 1346 1402 1592"> 2. Carry all business and employment sites forward, no change 3. Deallocate any business and employment sites that are not likely to come forward in the short term, major change </td> </tr> </tbody> </table>	<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>	1. Maintain majority of business and employment sites, limited change	2. Carry all business and employment sites forward, no change 3. Deallocate any business and employment sites that are not likely to come forward in the short term, major change	
<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>				
1. Maintain majority of business and employment sites, limited change	2. Carry all business and employment sites forward, no change 3. Deallocate any business and employment sites that are not likely to come forward in the short term, major change				

Community Area/Policy Theme

How best can we ensure land is available for business development?



Agree with preferred option – 12
 Agree with alternative option – 2
 Other / Don't Know – 3

Summary of comments from individuals:

- General support for development on brownfield sites as preferable to building on green belt (but did not state in particular which land uses).
- Development of brownfield business sites for alternative uses, again as a better option than building on green belt and improving sites considered 'eye-sores'.
- Business sites improved for business instead of reallocated to other uses, with improved telecommunications.

Summary of responses from groups and organisations:

Archibald Young Ltd - To reflect the changing nature of the property market and to stimulate regeneration and development, a more flexible approach to development planning is required. With this in mind, we would support a review of the existing business and employment sites and where appropriate, for example the subject site, alternative uses should be allowed. It is important to stress the planning system performs best when cognisance is taken of the wider property market, and the financial context within which development is provided.

Colliers c/o Tame Construction (Kirkintilloch Gateway) - We would contend that the preferred option (maintain majority of business and employment sites, limited change) is still too restrictive. The Business Land Review (2018) states that currently there is 19.86ha of vacant brownfield employment land in East Dunbartonshire, which is beyond the identified need of 13.2ha. There is therefore a requirement for some of these brownfield sites to be reallocated to alternative uses. We would therefore propose that the 2.8ha site at Woodilee Industrial Estate is reallocated for residential and retail uses in order to reduce some of this surplus land supply and bring brownfield land into productive use.

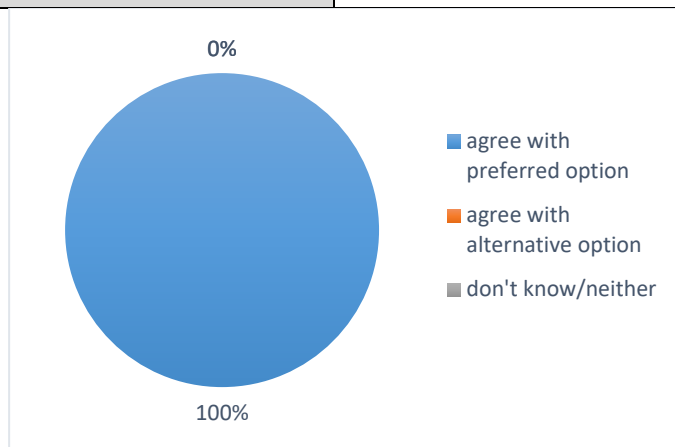
Avison Young c/o Aldi Stores - Our client disagrees with the preferred option to maintain the majority of the business and employment sites with limited change as there is currently an over-supply of employment land in East Dunbartonshire. The proposed plan should specify that, alternative uses should be re-allocated for sites unlikely to be used for employment and provide provision that other development could come forward

Community Area/Policy Theme	How best can we ensure land is available for business development?
<p>on these sites where appropriate, and where they meet the other policy tests set out within the Local Development Plan. This would be in accordance with paragraph 103 of SPP.</p> <p>Milngavie Community Council – Agree with preferred option</p> <p>Profilli Partnership for AE Holdings Limited (Waterside Bing) - This representation supports the Preferred Option, however research required into the ‘measured and strategic approach’ to be taken in selecting sites for de-allocating. If the change is only to allow selected sites, then more information required on how this selection will take place, will it expand upon the findings of the Business Land Audit and will it involve contacting all business land owners or just those that the audit identified as having vacant land.</p> <p>McEwan Hainey Planning & Development for James and Robert Rankin (Badenheath) - To reflect the changing nature of the property market and to encourage inward investment and development, a positive approach to development planning is required. With this in mind, in terms of Badenheath, we would support the Council’s preferred option, with the following caveat; we request that Badenheath is retained as a business and employment site with the added flexibility that not only would Class 6, Storage or Distribution uses would be acceptable but Class 5 General Industrial uses would also be acceptable.</p> <p>It is important to stress the planning system performs best when cognisance is taken of the wider property market, and the financial context and timeframe within which development is provided.</p> <p><i>Additional comments on Monitoring Statement</i></p> <p>The Business Land Audit notes on page 172 –</p> <p>“Badenheath is a large, undeveloped greenfield site. At almost 50 ha it is the largest site within East Dunbartonshire. It is situated 4 miles south-west of Cumbernauld town centre and is a short distance from Junction 4 of the M80 and Junction 3 of the M73. Regular bus services pass by which provide access to and from the train station in the centre of Cumbernauld and also to central Glasgow.”</p> <p>Furthermore, the Business Land Audit notes on page 172 –173/4 -</p> <ul style="list-style-type: none"> • “The site cannot easily be accessed via public transport.” • “Directly across from the site is Westfield North which lies in the North Lanarkshire council area and provides direct competition to the sites intended uses.” • “Neighbouring sites are better positioned and long established and have yet to find an occupier.” <p><i>Response</i></p> <p>These statements are contradictory. On the one hand, the Audit states “regular bus services pass by which provide access to and from the train station in the centre of Cumbernauld and also to central Glasgow.” However, it is also noted the site cannot be easily accessed. We believe the site can be easily accessed by public transport by the numerous services between East Dunbartonshire and Cumbernauld.</p> <p>The audit notes that Westfield is in direct competition to the future development of Badenheath and neighbouring sites are better positioned. We disagree with these statements, which fail to understand the potential of Badenheath as a strategically important large-scale distribution location, adjacent to the main motorway network. There are simply no other sites in the vicinity of Badenheath which offers the scale or location Badenheath can offer to developers. .</p>	

Community Area/Policy Theme	How best can we ensure land is available for business development?				
<p>Barton Wilmore for Powertek Utilities Ltd (Badenheath) - As per our response to Issue 32 (above) we disagree with the preferred option (Issue 32) and consider that the site at Badenheath should continue to be allocated within LDP2 for business/employment use.</p> <p>Persimmon Homes - The Monitoring Statement highlights that there is 31.15 hectares of vacant Brownfield land in East Dunbartonshire and that between 3018-36 it is forecast that only 13.3 hectares of business and employment land is required (0.74 hectares per annum). The Council must therefore review the existing Business and Employment land supply to ascertain which sites could be utilised for other uses to prevent vacant land blighting the wider area. We therefore support the principle of maintaining the majority of the existing business and employment sites where business and employment uses can be focused. This can result in greater collaboration between companies whilst also maintaining employment opportunities within East Dunbartonshire.</p> <p>SEPA - We support the Preferred Option, but as stated elsewhere we would support pro-active engagement to facilitate re-development of vacant and derelict land.</p> <p>SPT – Agree with the preferred option. These options should support opportunities for business development and encourage the re-use of brownfield land.</p> <p>SNH – We have no comment in respect of the principle of the reallocation of some sites to alternative uses. However, we would draw your attention to our site-specific comments in relation to: Issue 10: Westerhill, Bishopbriggs, Issue11: New Housing in Bishopbriggs, Issue 16: Vacant and derelict business land in Kirkintilloch, Issue 17: New Housing in Kirkintilloch and Issue 32: Badenheath.</p> <p><u>Issue 50 – Are the business and employment sites in good enough condition to suit their purpose or should any sites be regenerated to increase their commercial attractiveness?</u></p> <table border="1"> <thead> <tr> <th><u>Preferred Option</u></th> <th><u>Reasonable Alternative Option</u></th> </tr> </thead> <tbody> <tr> <td>1. Select business sites which have been identified as having capacity for more business use, but which have constraints related to their condition, and create a programme of regeneration.</td> <td>2. Allow all business sites to remain in their current state, no change</td> </tr> </tbody> </table>		<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>	1. Select business sites which have been identified as having capacity for more business use, but which have constraints related to their condition, and create a programme of regeneration.	2. Allow all business sites to remain in their current state, no change
<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>				
1. Select business sites which have been identified as having capacity for more business use, but which have constraints related to their condition, and create a programme of regeneration.	2. Allow all business sites to remain in their current state, no change				

Community Area/Policy Theme

How best can we ensure land is available for business development?



Agree with preferred option – 14
 Agree with alternative option – 0
 Other / Don't Know – 0

Summary of comments from individuals:

n/a

Summary of responses from groups and organisations:

Archibald Young Ltd - East Dunbartonshire’s assistance in the regeneration of vacant and derelict sites is to be welcomed and encouraged. This assistance could include funding infrastructure works, helping businesses secure grants or providing general business advice to local businesses. This type of assistance would be best served under an overarching proactive planning policy.

Milngavie Community Council – Agree with preferred option

Profilli Partnership for AE Holdings (Waterside) Limited (Waterside Bing) - This representation support’s the Preferred Option and with particular reference to Waterside where the existing safeguarded employment land at Pit Road (Site 30 in Business Land Audit) is identified in the audit as a ‘very poor quality multi-occupier employment site located in an inaccessible location’. The audit goes on to recommend that the council ‘examines the long-term future of this site for business use or as a potential redevelopment site and should work with the land owner to understand their aspirations for the site and the requirements or opportunity for improvements’ Page 29 Business Land Audit.

Waterside Bing is not assessed as part of the Business Land Audit as it is not an identified site in the current or past Local Development Plans and instead it features in the EDC document ‘Live Action and Delivery Programme April 2017’ which was produced alongside the adopted LDP, and refers to the Council’s action on Waterside Bing to “Establish contact with landowner to discuss potential opportunities in line with vacant and derelict land register’. To date no contact has been made by the council with the owner of the bing site.

Waterside Bing and Pit Road Industrial Estate are neighbouring properties although in different ownerships and share the same access route through south east Waterside. Both sites are in the greenbelt and with reference in the Green Belt Review Appendix 3 to the MIR as follows:-

Community Area/Policy Theme	How best can we ensure land is available for business development?
<p>“The green belt area around Pit Road has a more unsettled, urban edge character, with buildings, signage and post and wire fencing in a poor state of repair, and evidence of fly tipping. Lamp columns extend along the length of Pit Road from Waterside south-eastwards through the rolling farmland to a group of buildings, probably formerly associated with the mine but now housing a variety of light industrial uses including welding and steel fabrication. A flat-topped ridge culminates in a steep sided, well vegetated bing, a prominent legacy of previous mining activity. Positive management of the Pit Road area and former mining buildings could enhance environmental green belt functionality and enhance the agricultural character of the area to the south-east of Waterside”.</p> <p>From the above description and from visiting both sites it becomes clear that each property has a bearing on the other with Waterside Bing given its scale and past industrial use having the dominant presence. It seems timely given the consultation on Main Issues Report, the findings of the Business Land Audit on the Pit Road Estate and this request that Waterside Bing should be included as a site for business and employment use, that the potential of these two sites should be explored further and prior to the publication of the Proposed LDP2.</p> <p>Profilli Partnership for AE Holdings (Waterside) Limited (Waterside Bing) - East Dunbartonshire’s assistance in the regeneration of vacant and derelict sites is to be welcomed and encouraged. This assistance could include funding ground works, helping businesses secure grants or providing other business advice to local businesses. This type of assistance would be best served under an overarching proactive planning policy.</p> <p>Persimmon Homes - This issue goes hand in hand with Issue 49. Developer contributions used to off-set the loss of some Business and Employment sites can be used to regenerate existing commercial areas making them more attractive to invest in. Where the funding is used to upgrade private land the agreement relating to this should include payback clauses should the use of the site change within a set time period.</p> <p>SPT – Agree with the preferred option. These options should support opportunities for business development and encourage the re-use of brownfield land.</p> <p>General comments from individuals regarding business and employment land (not related to a specific issue):</p> <ul style="list-style-type: none"> • Business areas need to be accessible via active transport or located in town centres/ near railway stations • More business development should be encouraged to tackle unemployment 	
Planning Authority response	
<p>The Proposed Plan has been prepared taking into account the responses received on the following issues.</p> <p>Issue 48 – Are East Dunbartonshire’s business and employment sites occupied by appropriate uses and should the definition of these sites change?</p> <p>The majority of individual responses were in support of the preferred option – broadening the use classes permitted on business and employment sites beyond strictly classes 4, 5 and 6. Only one individual respondent disagreed, stating that the issue ‘needs careful review’, but offering no further clarification. The businesses which responded also agreed with the preferred option, with comments that adherence to the use classes is too restrictive. One response did include the caveat that any alternative employment uses</p>	

Community Area/Policy Theme	How best can we ensure land is available for business development?
<p>must be compatible with existing businesses. SPT also advised that policy wording will need to be precise in order to avoid development which would undermine town centre and sustainable transport objectives. The Council recognises the validity of concerns about the potential impact of permitting alternative uses on existing businesses, town centres, and sustainability. It is felt that these issues can be addressed through careful wording of the policy.</p> <p><i>Conclusion: Implement preferred option</i></p> <p>Issue 49 – Should all of the currently designated business and employment sites be carried forward to LDP2 or should any be re-allocated to alternative uses?</p> <p>Two thirds of individual responses were in agreement with the preferred option. Comments from individuals were unanimously in support of development on brownfield sites as an alternative to releasing sites on the green belt. Some respondents described vacant business and employment sites as an eyesore, and were keen to see them developed for any use, whereas some responses were in favour of retaining these sites within the business and employment land supply and improving them to encourage business use. The responses from organisations were mixed, with some supporting the preferred option, while others – particularly developers – arguing for deallocation of more business and employment land due to a perceived surplus. There were some site-specific comments regarding the Badenheath site, arguing for the viability of this site for business and requesting that it is not deallocated from business and employment use. The Council maintains that it is important for local economic growth that marketable sites are retained for future business and employment, but also acknowledges the value to communities of bringing vacant and derelict sites into productive use. Given the interest in bringing forward the Badenheath site for business and employment use, the Council will review this site and meet with the landowners and other involved parties. The Council is also in the process of producing a Business Land Requirement Report, which will give an updated analysis of East Dunbartonshire’s business and employment land supply and requirements, although it should be noted that the Council does not consider there to be an excessive amount of land allocated for business and employment use. The purpose of analysing the supply of business and employment land is to ensure that it will be sufficient to support local business growth, not to provide a set target or limit.</p> <p><i>Conclusion: Policy to comprise a combination of preferred and alternative option</i></p> <p>Issue 50 – Are the business and employment sites in good enough condition to suit their purpose or should any sites be regenerated to increase their commercial attractiveness?</p> <p>All respondents were in agreement with the preferred option and no specific comments were received from individuals relating to this issue. The responses from organisations were all strongly in favour of the preferred option, welcoming any Council support to help regenerate business and employment land. Some suggestions for how sites could be regenerated included: improvement to infrastructure; advice to businesses on how to access funding; and use of developer contributions from deallocated sites to invest in existing business areas. The Council is committed to continuing to support local businesses where possible with their aspirations and to investigating how economic growth can be facilitated through business and employment land policy.</p> <p><i>Conclusion: Implement preferred option</i></p>	

Community Area/Policy Theme	How best can we ensure land is available for business development?
<p>The Proposed Plan is subject to consultation, with all representations being considered by a Reporter on behalf of Scottish Ministers. This provides a final opportunity for comments.</p>	

Can we be more proactive in developing our visitor economy?

Community Area/Policy Theme	Can we be more proactive in developing our visitor economy?									
Elements of the engagement included:	<ul style="list-style-type: none"> • Questionnaire • Drop In Session • Email responses 									
No. of Persons / List of Organisation(s) commenting on this topic										
<ul style="list-style-type: none"> • Go Bike • Historic Scotland • Milngavie Community Council • Scottish Natural Heritage (SNH) • Strathclyde Partnership for Transport (SPT) 										
Planning authority's summary of comments:										
<p><u>Issue 51 – Should LDP2 policy on visitor economy/tourism set out criteria to encourage appropriate new visitor economy/tourism development, with a focus on our key assets?</u></p>										
<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>									
1. Provide criteria to encourage appropriate new visitor economy/tourism development and specifically focus on Tourism Asset Areas by providing policy for each asset area	2. Provide criteria to encourage appropriate new visitor economy/tourism development without specifying locations (Tourism Asset Area approach)									
<div data-bbox="204 1406 895 1899" data-label="Figure"> <p>A pie chart illustrating the distribution of responses. The chart is almost entirely blue, representing 100% agreement with the preferred option. A legend to the right identifies the colors: blue for 'agree with preferred option', orange for 'agree with alternative option', and grey for 'don't know/neither'. The percentages 0% and 100% are labeled on the chart.</p> <table border="1"> <thead> <tr> <th>Response</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>agree with preferred option</td> <td>100%</td> </tr> <tr> <td>agree with alternative option</td> <td>0%</td> </tr> <tr> <td>don't know/neither</td> <td>0%</td> </tr> </tbody> </table> </div> <p data-bbox="300 1908 662 2011"> Agree with preferred option – 60 Agree with alternative option – 0 Other / Don't Know – 0 </p>			Response	Percentage	agree with preferred option	100%	agree with alternative option	0%	don't know/neither	0%
Response	Percentage									
agree with preferred option	100%									
agree with alternative option	0%									
don't know/neither	0%									

Community Area/Policy Theme	Can we be more proactive in developing our visitor economy?
-----------------------------	---

Summary of comments from individuals:

- Agreement with preferred option, but concern that the visitor economy cannot be improved without also improving parking, public transport and active travel routes.
- More detail would be needed on the type of proposed development/policy for each asset area

Summary of responses from groups and organisations:

Milngavie Community Council – Agree with preferred option

Go Bike - Many people from other parts of Scotland, and other countries, visit Scotland on holiday and it is important that there are good cycling and walking routes. It is far easier to see the countryside from a bike or by walking than it is from the confines of a car, so active travel must be provided for.

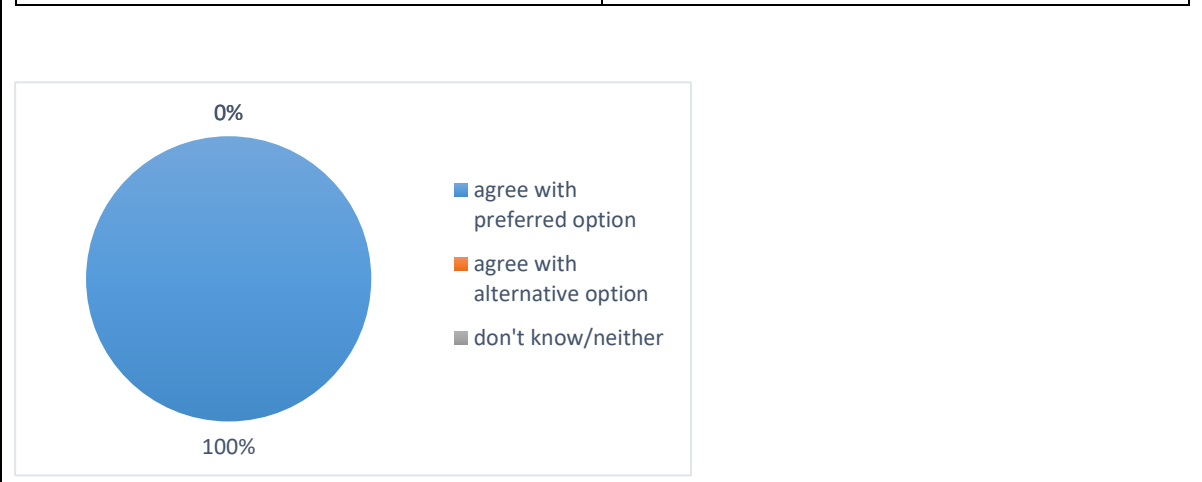
Historic Scotland - As stated for the individual community areas above, we are content with the preferred option to provide criteria to encourage appropriate development with a focus on TAAs. Specific TAAs with designated historic environment assets may require further consultation with HES regarding the criteria as laid out above.

SPT – Agree with the preferred option. This approach to encouraging new tourism development encourages best use of the areas assets while seeking to manage and direct demand.

SNH - Yes. We support the principle of this approach. It will be important to ensure that specific proposals to promote the 'Tourism Asset Areas' also provide for their understanding and ensures protection and enhancement.

Issue 52 – Should LDP2 include policy wording regarding short-term lets?

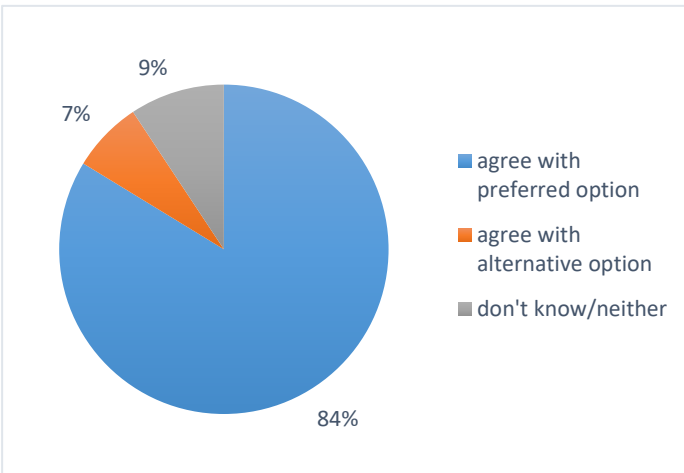
<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>
1. Include additional wording to support the assessment of applications for visitor accommodation and short-term holiday lets	2. As Option A but also consider impact upon housing land supply



Community Area/Policy Theme	Can we be more proactive in developing our visitor economy?
<p><i>Summary of comments from individuals:</i></p> <ul style="list-style-type: none"> • Airbnb should be significantly controlled • Agree with preferred option of encouraging new tourism accommodation in the countryside. <p><i>Summary of responses from groups and organisations:</i></p> <p>Go Bike - Holiday lets are a concern in many parts of Scotland and should be controlled to a high standard by the local authority.</p> <p>SPT – Suggest that there should be the option to move towards option 2 if an issue is identified within the life of LDP2.</p>	
Planning Authority response	
<p>The Proposed Plan has been prepared taking into account the responses received on the following issues.</p> <p>Issue 51 – Should LDP2 policy on visitor economy/tourism set out criteria to encourage appropriate new visitor economy/tourism development, with a focus on our key assets?</p> <p>Responses from individuals were generally in agreement with the preferred option although some commented that the visitor economy cannot be further developed without improvements to parking, public transport and active travel routes. A couple of the responses were uncertain about the preferred option and asked for more detail to be provided about the type of proposed development for each asset area and how the location of the areas will be defined. The key agencies, including: Go Bike, Historic Scotland, SPT and SNH, were all supportive of the preferred option. The Council aims to provide a proactive policy for tourism that will clarify what development would be considered appropriate to enhance East Dunbartonshire’s tourism assets.</p> <p><i>Conclusion: Implement preferred option</i></p> <p>Issue 52 – Should LDP2 include policy wording regarding short-term lets?</p> <p>All responses to this issue were in support of the preferred option, encouraging the development of more visitor accommodation but recognising that unregulated short-term lets have caused issues in other areas where concentrations of them are higher. SPT suggested in their response that there should be leeway in the policy to move towards the alternative option (of not only allowing for regulation of short-term lets, but also requiring applications to consider potential impacts on housing supply). Since the MIR was published, the Scottish Government has announced plans to introduce a licencing scheme for short-term lets. This licensing scheme will come into force in 2021, after which all short-term lets operating in Scotland will need to be licensed and comply with the mandatory safety requirements. In addition, Scottish Councils have been given new powers to add conditions to the licensing scheme and designate control areas, where planning permission will be required to change the use of a residential property to a short-term let. This will not apply to home-sharing arrangements (where someone rents out a room in their own home, or allows people to stay in their home while they are away). At present, East Dunbartonshire Council does not anticipate the need to exercise this power, however the Council will implement the preferred option by providing criteria for assessing applications for short-term lets should this need arise.</p>	

Community Area/Policy Theme	Can we be more proactive in developing our visitor economy?
<p><i>Conclusion: Implement preferred option</i></p> <p>The Proposed Plan is subject to consultation, with all representations being considered by a Reporter on behalf of Scottish Ministers. This provides a final opportunity for comments.</p>	

Should we carry out a review of historic environment designations?

Community Area/Policy Theme	Should we carry out a review of historic environment designations?									
Elements of the engagement included:	<ul style="list-style-type: none"> • Questionnaire • Drop In Session • Email responses 									
List of Organisation(s) commenting on this topic										
<ul style="list-style-type: none"> • Historic Environment Scotland • Milngavie Community Council • Milngavie Golf Club • Visit Scotland • Woodland Trust Scotland 										
Planning authority's summary of comments:										
<p>Issue 53 – Should the historic environment value of Conservation Areas and Townscape Protection Areas be updated?</p>										
<u>Preferred Option</u>	<u>Reasonable Alternative Option</u>									
1. Review all Conservation Areas and Townscape Protection Areas.	2. Retain all conservation areas and townscape protection areas as they are currently designated.									
 <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Response</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>agree with preferred option</td> <td>84%</td> </tr> <tr> <td>agree with alternative option</td> <td>7%</td> </tr> <tr> <td>don't know/neither</td> <td>9%</td> </tr> </tbody> </table>			Response	Percentage	agree with preferred option	84%	agree with alternative option	7%	don't know/neither	9%
Response	Percentage									
agree with preferred option	84%									
agree with alternative option	7%									
don't know/neither	9%									
<p>Agree with preferred option – 36 Agree with alternative option – 3 Other / Don't Know – 4</p>										

Community Area/Policy Theme

Should we carry out a review of historic environment designations?

Summary of comments from individuals:

There was clear support for a review of the Conservation Areas and Townscape Protection Areas. A summary of the key points raised during the consultation is set out below:

- Agree. Conservation Area guidance is dated and requires updating. Also needs to be more flexible to allow for modern sustainable design.
- Review of Conservation and Protection Areas should consider designation of new areas – especially those of rural beauty.
- Conservation and protection of historic areas should be strengthened.
- Restore and care for existing sites
- Promote the Roman Wall more actively
- Huntershill House – look to protect its character and setting
- Agree that these areas need reviewed, but not for de-designation.
- What exactly is meant by carrying out a review?
- Baldernock should be consulted on changes. Consideration should be given to protecting our country lanes, hedgerows, trees and other features. Perhaps attention should be paid to the amount of heavy traffic through our conservation areas especially when there are road closures - when other routes are available. Issues with signage in conservation areas should be properly addressed. (For sale signs, Xmas trees for sale, business advertising etc.) Sites of archaeological importance should be redefined. In Baldernock, e.g. only one mill site is annotated with a brown dot on your map, whereas there are two other mill sites, in addition to the recent discovery of a flax mill.
- Review should not de-designate areas – will lead to areas being deliberately neglected.
- By their nature historic environment is historic! Any review should not redesignate existing areas.
- Antonine Wall is protected absolutely in LDP1, Policy 10. Why therefore has TP/ED/19/0328 – Bearsden Golf Club Expansion not already been rejected?
- Restore and care for existing sites
- If this is to justify eliminating certain historical buildings and areas which were once conserved, to replace with further housing, I would not agree with this. But I cannot oversee how this change will influence the urban fabric, hence 'don't know.'
- The recent reviews of East Dunbartonshire has already clarified the importance of these areas. I would only support future reviews if they were designed to enhance or improve these currently existing preserved areas.

Summary of responses from groups and organisations:

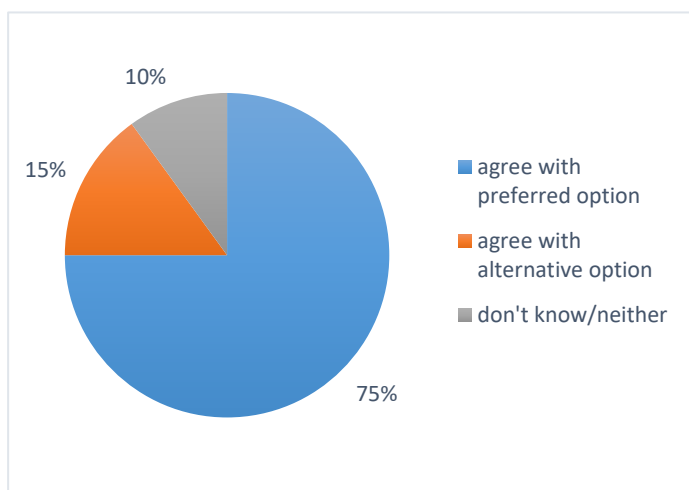
Milngavie Community Council – Agree with preferred option

Historic Environment Scotland - You may wish to clarify the wording for this issue as we are not entirely clear what 'historic environment value' means. However, we are content with the preferred option to review all Conservation Area and Townscape Protection Area appraisals which will ensure that these designations are up to date and fit for purpose.

Issue 54 – Should the historic environment value of locally important historic gardens and designed landscapes be updated?

Community Area/Policy Theme	Should we carry out a review of historic environment designations?
-----------------------------	--

Preferred Option	Reasonable Alternative Option
1. Review Locally Important Historic Gardens and Designed Landscapes	2. Retain all sites currently designated.



- Agree with preferred option – 18
- Agree with alternative option – 5
- Other / Don't Know – 0

Summary of comments from individuals:

There was clear support for a review of the Locally Important Gardens and Designed Landscapes. A summary of the key points raised during the consultation is set out below:

- Review areas to walking the Campsies, car parking and trees
- Review, Protect, enhance, make accessible where reasonable to do so, can they support more biodiversity?
- Review is ok as long as current protected areas and landscapes are maintained.
- Historic gardens and designed landscapes – yes review, but for lower quality areas it needs to be considered if they can be improved / restored/ enhanced. If dedesignated would be at increased risk of development for housing.
- Review is appropriate but with predilection towards protecting historic and designed landscapes for amenity, biodiversity and tourism value.
- What historic gardens?
- No de-designation of areas in Milngavie.
- Review of lower quality areas is an open invitation to landowners to neglect areas which they can then sell for housing – many of the developers’ calls for sites fall in designated areas. These areas require protection, which the LDP approach does not provide.
- Why review? More protection should be given to protecting historic garden.

Summary of responses from groups and organisations

Woodland Trust Scotland – agree. A similar review should be conducted for the AW inventory at a local level, and discussions could take place with SNH who are the keepers of the Ancient Woodland Inventory for

Community Area/Policy Theme	Should we carry out a review of historic environment designations?
<p>Scotland. The AWI is currently incomplete and is not being updated regularly. Such a update would help set a baseline for ancient woodland in East Dunbartonshire and help quantify where there is ancient woodland, how much is left and what condition this is in. It is vital that ancient woodland is mapped in order to protect it.</p> <p>Visit Scotland – yes</p> <p>Milngavie Community Council – Agree with preferred option</p> <p>Historic Environment Scotland - As with Issue 53 we are not clear on the wording of this question, however we are content with the preferred option to review all locally important historic gardens and designed landscapes to ensure that they are up to date and fit for purpose.</p> <p>Milngavie Golf Club – agree. Our club and course have some historically interesting artefacts and landscapes that the wider public currently don't have access to. We wish to open this up. The new road link bypasses an old overgrown stone stile, that we will reinstate and maintain going forward. The history of this area includes old factories for leather and ink as we understand and we intend to highlight and cultivate this information for visitors.</p>	
Planning Authority response	
<p>The Proposed Plan has been prepared taking into account the responses received on the following issues.</p> <p>Issue 53 – Should the historic environment value of Conservation Areas and Townscape Protection Areas be updated?</p> <p>In the main the responses supported the preferred approach, including the need to need to enhance, improve or care for existing sites and ensure that these designations are up to date and fit for purpose. Whilst some support was expressed for the alternative option, in particular no de- designation of sites, it is not agreed that any responses received provide a rationale for pursuing the alternative option. An objective of the technical review of designations include providing a justification for designating areas as having special importance, therefore if a designation includes an area which is not of special importance this should be recognised or if another area has special qualities it should be protected by the most appropriate designation. The Plan already designates a buffer zone for the Antonine Wall World Heritage Site and Local Landscape Areas so these areas are up to date, including Torrance to Baldernock Local Landscape Area. However the Conservation Area and Townscape Protection Areas which sits within these have different criteria for designation and will be included in this review. Huntershill House and its curtilage and setting are protected by its category B listing. The Proposed Plan identifies some important archaeological sites however this is not comprehensive as archaeological finds change over time and the Historic Environment Policy protects other sites, so there is not a need for the list of sites in the Proposed Plan to be updated.</p> <p><i>Conclusion: Implement preferred option</i></p> <p>Issue 54 – Should the historic environment value of locally important historic gardens and designed landscapes be updated?</p>	

Community Area/Policy Theme	Should we carry out a review of historic environment designations?
<p>In the main the responses supported the preferred approach, including protecting and enhancing the value of these areas and making sure that the designations are up to date and fit for purpose. Whilst some support was expressed for the alternative option, in particular not de-designating any sites, it is not agreed that any responses received provide a rationale for pursuing the alternative option. One objective of the review is to identify whether each site meets the criteria of a locally important garden and designed landscape, and can therefore be defended at planning application stage. Where a site is identified as having lower value it may also be identified and protected as a listed building, local nature conservation site, open space or part of the green network, which may be a more appropriate designation. Gardens and designed landscapes must meet a set of criteria and the Campsie Fells, ancient or native woodlands and Milngavie Golf Course do not meet that criteria so are outwith the scope of this review. Local Nature Conservation Sites, including some ancient woodlands, are however subject to a rolling programme of surveys to keep information on these up to date. All sites identified in the call for sites have been subject to a site assessment which considers a range of factors not just whether it is designated as a locally important garden or designed landscape or not.</p> <p><i>Conclusion: Implement preferred option</i></p> <p>The Proposed Plan is subject to consultation, with all representations being considered by a Reporter on behalf of Scottish Ministers. This provides a final opportunity for comments.</p>	

Minor areas of change – Comments

Community Area/Policy Theme	Minor areas of change – Comments
Elements of the engagement included:	<ul style="list-style-type: none"> • Questionnaire • Drop In Session • Email responses
List of Organisation(s) commenting on this topic	
<ul style="list-style-type: none"> • Coal Authority • Glasgow Airport • Scottish Environment Protection Agency (SEPA) • Scottish Natural Heritage (SNH) 	
Planning authority's summary of comments:	
<p><u>Kirkintilloch, Lenzie and Waterside Community Area</u> How can LDP2 reflect the granting of consent for the new sports facility at Donaldson Street/Southbank Road?</p> <p>No responses</p> <p><u>Policy 1. Sustainable Economic Growth</u> How could LDP2 better set out the spatial strategy as regards proposals for the development and use of land in the area?</p> <p><i>SEPA</i> - The MIR seems to adopt a sound place-making approach supplemented by good use of clear plans showing local issues and interests, with good community engagement, so it is difficult to see how the spatial strategy could be better set out. One aspect that perhaps could have been developed more would have been the land-use planning elements of other policies and strategies, such as that relating to air quality. There are two AMAs within the area covered by LDP2, and land use planning measures to address air quality would have been useful.</p> <p><u>Policy 2. Design and Placemaking</u> Should LDP2 specify the type of design tool required for different scales/sensitivities of development?</p> <p>No responses</p> <p>Should LDP2 be clearer on site-specific requirements for development proposals, in particular those with environmental or other constraints?</p> <p><i>SEPA</i> - consider that the more information that the developer is provided with within allocation requirements then the more effective the subsequent development management process is. However, for this to work well, it also requires the planning authority to implement those requirements. For example, if the allocation is subject to Flood Risk Assessment in order to determine the developable area, then we would expect the planning authority to require the submission of a Flood Risk Assessment prior to consulting SEPA.</p>	

Community Area/Policy Theme	Minor areas of change – Comments
	<p>SNH - We support the preferred option which we understand will be a revision of Policy 2 to set out clear requirements for design tools for sites of particular scales/ sensitivities, whether or not allocated in the LDP or not. This would include development for example, where key environmental sensitivities, including natural heritage designations should be avoided or mitigated.</p> <p>We also understand that the intention of the preferred option would be to build upon the inclusion of key site requirements as in LDP1 and extend this to the identification of further site specific requirements for development, particularly those with environmental or other constraints that should be avoided or mitigated.</p> <p>The above amendments to the Policy, would we consider provide certainty from the outset for developers and other stakeholders for a design led approach.</p> <p>How can the policy reflect the Design and Placemaking Supplementary Guidance and Green Infrastructure and Green Network Supplementary Guidance, published since LDP was adopted?</p> <p>No responses</p> <p><u>Policy 3. Supporting Regeneration and Protection of the Green Belt</u></p> <p>How could LDP2 better set out the spatial strategy as regards proposals for the development and use of land in the area?</p> <p>No responses</p> <p><u>Policy 4. Sustainable Transport</u></p> <p>How can the policy be strengthened to ensure clarity on delivery of road safety measures?</p> <p>While it is to be welcomed that Road Safety is a high priority in Policy 4, I found the MIR to be lacking overall in Sustainable Transport ambition. It has been given some focus in individual community areas, however under Issue 42 entitled "Sustainable Transport" there has been little said about public transport and more about active travel. Both these areas must be addressed more urgently in EDC's LDP2. I understand that the Local Transport Strategy will aim to address this, however LDP2 and the LTS must be inextricably linked and both must have ambitious and measurable targets to reduce pollution, increase biodiversity and tackle the climate emergency.</p> <p><u>Policy 5. Green Infrastructure and Green Network</u></p> <p>How could LDP2 better set out the spatial strategy as regards proposals for the development and use of land in the area?</p> <p>No responses</p> <p>Should the planting and restocking of woodland protect East Dunbartonshire's biodiversity better?</p> <p>SNH - From our understanding of the MIR/SEA (MIR - Monitoring Statement p. 333 refers), two possible alternatives are being presented: (1) Updating the Plan to refer to the emerging Clydeplan Forest and Woodland Strategy alongside guidance on specific biodiversity issues to consider in relation to planting &</p>

Community Area/Policy Theme	Minor areas of change – Comments
	<p>restocking in East Dunbartonshire or (2), the provision and incorporation of a spatial framework in the Plan for woodland planting and restocking.</p> <p>Whilst a spatial framework is generally to be welcomed, which we also understand would include additional EDC specific requirements and considerations for biodiversity, it would be essential in the interests of certainty to clearly detail in the Plan itself what biodiversity issues need to be considered. Tree planting whilst supported/suitable in many circumstances is not always appropriate in 'biodiversity' terms for all sites. Whilst, SSSI's and sites with national designations should be protected already if tree planting is inappropriate to them, local designations would potentially be at risk such as Local Nature Conservation Sites (LNCS) supporting lowland grasslands etc. Extensive tree planting in these circumstances, would greatly reduce the biodiversity value and integrity of such designations.</p> <p>If this approach is to be taken forward, we consider therefore that the Plan itself would require to provide clear, unambiguous policy detail and guidance to ensure prevention of such impacts on biodiversity.</p> <p><u>Policy 6. Creating Inclusive and Sustainable Communities</u></p> <p>Is the current policy on ancillary accommodation too restrictive by having a general presumption against detached annexes?</p> <p>No responses</p> <p>How should LDP 2 continue to provide a route for suitable Gypsy/Traveller accommodation to be delivered in the event of increased demand?</p> <p>In relation to Lennoxton Gypsy/Traveller site we are in mutual agreement that the site appropriately meets our cultural needs and holds the capacity to successfully home a number of Gypsy/Traveller families on a permanent basis as well as providing space for other Gypsy/Traveller families to have transit accommodation when required.</p> <p>We would like to highlight our significant interest in a short term plan for Lennoxton Gypsy/Traveller site to be safeguard for the purpose of providing culturally appropriate Gypsy/Traveller accommodation with the intention of future plans for the redevelopment and opening of the site. We would request that this action is taken at the earliest time possible.</p> <p>We express an interest to be fully involved in a participative approach with future discussions regarding plans for redevelopment of the site, in order to support the development of a culturally appropriate design.</p> <p>We would request that a flexible approach be taken in identifying methods of securing tenancy, giving examples of full local authority provision on permanent or transit basis, shared ownership or help to buy in order to maximise the opportunity of the redevelopment.</p> <p>We believe that a live plan for redevelopment and proactive action would encourage other Gypsy/Traveller families to come forward to identify their need for provision of culturally appropriate accommodation in the area.</p> <p>We have considered how Lennoxton Gypsy/Traveller site would meet our cultural needs against the Place Standard tool, should the site be redeveloped for use:</p>

Community Area/Policy Theme	Minor areas of change – Comments
	<ul style="list-style-type: none"> • Natural space: We view the space as being in a healthy spot with open outlook, it does not appear to be on a contaminated or industrial area. • Play and recreation: We view the site as having the ability to provide pitch sizes allowing for secure play areas for children and there is a football pitch close to the site allowing for activity/sport based play for older children. • Facilities and amenities, Moving around, Public transport, Traffic and parking: The site is within walking distance to local services such as pharmacies, local shops and has direct access to transport routes to larger outlying areas for hospitals and superstores etc. The site has pavement access suitable for walking and has extended open areas surrounding it. • Work and local economy: We have held an established work history around the local area for the past 25 years and feel trusted by local residents. • Housing and community: The area has a good mix of social and private housing, indicating positive potential for diverse communities to live as neighbours and the small community set up would allow for integration and belonging. • Identity and belonging: Our families have been part of the local and surrounding area for 3 generations, attending schools while growing up and viewing the area as home. • Feeling safe: We feel safe due to having built relationships in the area over an extended period of time and continuing to have family members in the area who are experiencing no problematic issues. • Influence and sense of control: Taking a participatory approach to any future development of the site would provide a sense of cultural acceptance and enable us to be part of creating a home with cultural privacy while also feeling part of the local community. <p>In accordance with everyone’s responsibility to view the provision of accommodation in line with a human rights approach, the Lennoxton Gypsy/Traveller site (when redeveloped) evidences the following:</p> <ul style="list-style-type: none"> • Protecting a ‘minimum core’ of rights – we are currently camping on a privately owned site with no security of tenure. We are at the whim of our landlord deciding to move us on or to close the site. Should this happen we would be forced to present for homeless accommodation or to camp roadside. We have the right to be protected against the threat of forced eviction. Our current living conditions provide us with a pitch to accommodate one caravan and one motor vehicle with approximately 2 feet between, no space for mixed family provision and no secure fencing for the safety of children. The toilet and showering facilities are shared by the whole site, provide no heating and no hand washing facility. We are required to provide our own cooking and kitchen facilities with wooden or plastic huts. • Progressive realisation – Although recognition is given to the barriers faced by councils in providing culturally appropriate accommodation, usually through limited funding, it is essential that realistic action is taken to allocate and secure funding. Taking a participative approach to site design and redevelopment would demonstrate a willingness to achieve progress in relation to the provision of Gypsy/Traveller site provision. Taking such an approach gives greater possibility of gaining culturally informed understanding of needs and preferences. • Non-retrogression – Although the current situation with the Lennoxton Gypsy/Traveller site being disused does not directly add to the worsening of provision of culturally appropriate accommodation, there is now a clearly identified need for redevelopment. Should the decision be taken for the reallocation of the site to be made for other purposes this would most definitely be detrimental in worsening the situation currently faced by the Gypsy/Traveller community. • Maximum of available resources – As previously stated there is recognition of the barriers faced regarding funding, there does require to be clear committed action to resolving the issues and identify potential funding paths to ensure that the needs of Gypsy/Travellers are met through the housing and investment programme. • Non-discrimination – It is mandatory for a community’s basic human rights that we are not discriminated against. It is not acceptable to assume an unidentified need or to act cautiously when

Community Area/Policy Theme	Minor areas of change – Comments
	<p>this need is identified. Levels of mistrust and acceptance of poor quality standards by the Gypsy/Traveller community must be recognised as factors of low levels of self-identification and engagement. Although it is positive that Lennoxton Gypsy Traveller site has been safeguarded as such for a number of years, it is unacceptable that it has been uninhabitable for this extended period of time when the Gypsy/Traveller community are experiencing such low levels of culturally appropriate accommodation. Supply must outweigh demand in all instances.</p> <ul style="list-style-type: none"> • Convention on rights of child – Within only a matter of days of engagement being requested, families inclusive of 5 children have identified as requiring culturally appropriate accommodation in the area of East Dunbartonshire and have given detailed description of experiencing living standards excessively the minimum requirements. <p>The Scottish Government and COSLA launched their joint National Action Plan – Improving the lives of Gypsy/Travellers in October 19 which recommends that Gypsy/Travellers are recognised as respected and valued members of Scotland’s diverse population and are listened to in decisions that affect their lives.</p> <p>Future redevelopment of Lennoxton Gypsy/Traveller site gives the opportunity to create a live situation of providing a safe and culturally appropriate place for at least 7 families to live.</p> <p>Does the policy for new housing in the greenbelt for agricultural workers require to be amended?</p> <p>No responses</p> <p><u>Policy 7. Community Facilities and Open Space</u></p> <p>How can the policy wording be enhanced to ensure that the intentions of the policy are fully understood?</p> <p>No responses</p> <p><u>Policy 8. Protecting and Enhancing Landscape Character and Nature Conservation</u></p> <p>How can the policy reflect the Green Infrastructure and Green Network Supplementary Guidance and Natural Environment Planning Guidance, published since LDP was adopted?</p> <p>SNH - It is our understanding that the preferred option is to update the Plan and associated changes to take account of and reflect changes that have occurred since the adoption of LDP1. In the interests of clarity, certainty and compliance, we consider that the key policy detail and requirements currently contained within the content of the Natural Environment Planning Guidance and Green Infrastructure and Green Network Supplementary Guidance be updated and included within the Plan.</p> <p>How do we take into account changes to natural environment designations over the plan period?</p> <p>SNH - We welcome the preferred option which we understand to be for the inclusion of proposed designations such as new LNR’s and LNCS as identified in other strategies (Open Space and Green Network Strategies), together with those already accepted and included in LDP1.</p> <p>Strengthen policy to introduce requirement for peatland management plans where peat/carbon-rich soils may be affected by development.</p>

Community Area/Policy Theme	Minor areas of change – Comments
	<p>SEPA - We support the proposals to strengthen the policy to introduce a requirement for peatland management plans where peat/carbon-rich soils may be affected by development, and as part of this, when peat is identified on site, for there to be a survey to quantify depths and condition and potential mitigation.</p> <p>SNH - We understand that the preferred option is to strengthen the existing policy statement that peat and other carbon rich soils should not be drained or disturbed by development by adding a requirement that developers should (in relevant situations) produce Peatland Management Plans. Provided that there is a requirement that such plans adequately demonstrate how peatlands for example will be hydrologically protected, we welcome the approach.</p> <p>Policy 9. Enhancing the Water Environment</p> <p>Should we update sustainable drainage system SuDS requirements to align with new SEPA requirements?</p> <p>SEPA - support enhanced policy support for measures that deliver contributions to improvements to blue/green infrastructure, multi-functional SUDS that deliver biodiversity and amenity value, improvements to watercourses including removal of restrictions to fish passage and deculverting where feasible. These should not be seen just as SEPA requirements or recommendations, but reasonable environmental and sustainable measures that the planning authority and many other stakeholders accept as now being matters to be sought and delivered through the planning process where feasible.</p> <p>Can the policy better support delivery of the River Basin Management Plan and Green Network?</p> <p>SEPA - suggest in relation to the water environment, that the role of sustainable flood risk management should be recognised in, for example, the policy framework for sustainable placemaking and blue/ green infrastructure and the identification of existing and creation of new blue/green infrastructure in the spatial strategy.</p> <p>SNH - We understand that the preferred option is to ensure SEPA requirements are built into the policy while the alternative would build in requirements and also recommendations relating to the blue – green network and retrofitting SUDS. The alternative would also cross refer to current guidance on green infrastructure and the green network. Given the potential for further positive impacts we would support the alternative option.</p> <p>Policy 11. Network of Centres</p> <p>Should the Network of Centres Policy be merged with Policy 12 (Retail and Commercial Development)?</p> <p>No responses</p> <p>Does the policy need to include wording on impact of noise-generating uses on residential amenity?</p> <p>No responses</p> <p>Policy 12. Retail and Commercial Development</p> <p>Should the Retail and Commercial Development Policy be merged with Policy 11 (Network of Centres)?</p> <p>No responses</p>

Community Area/Policy Theme	Minor areas of change – Comments
<p><u>Policy 13. Creating a Supportive Business and Employment Environment</u> Are home-based businesses and the spaces in which they operate appropriately defined?</p> <p>No responses</p> <p><u>Policy 15. Renewable Energy and Low Carbon Technology</u> Do we need a new spatial framework for significant solar and biomass proposals?</p> <p><i>SEPA</i> - consider that the planning authority is best placed to assess the need for this, dependent upon the number of proposals you have received or anticipate. On biomass, this definitely should be related to air quality in specific areas, an issue referred to elsewhere within the MIR, but not identified in current LDP policies.</p> <p><u>Policy 16. Managing Waste</u> Can the policy provide a more effective framework for the sustainable management and storage of domestic and commercial waste?</p> <p>No responses</p> <p>Can LDP2 better promote and enable a zero-waste lifestyle?</p> <p>No responses</p> <p><u>Policy 17. Mineral Resources</u> Should the policy continue to refer to the moratorium on unconventional oil and gas extraction?</p> <p><i>Coal Authority</i> - Based on the Scottish Government’s latest policy stance on unconventional oil and gas extraction, it would not be relevant to include a policy for something which Scottish Government have indicated they do not support. It may be more appropriate to discuss the policy stance for unconventional oil and gas in the wider text but not include a specific policy reference (unless there are exceptional circumstances when you would consider approving such proposals, in which case you may consider the inclusion of such a policy against which to assess the development relevant). It would seem reasonable and justified to set out a policy against which mineral resources can be considered. We therefore consider it appropriate to include the types of mineral workings to which the policy relates, to give direction to those using the policy framework.</p> <p>Should the assessment criteria specify the types of mineral workings that will be subjected to the policy?</p> <p>No responses</p> <p><u>Policy 18. Digital Communications</u> Does the policy make it clear enough which sites require digital communications infrastructure?</p> <p>No responses</p>	

Community Area/Policy Theme	Minor areas of change – Comments
<p>Policy 19. Airport and Hazardous Installations Safeguarding</p> <p>How do we update noise contour mapping?</p> <p><i>Glasgow Airport</i> - Support LDP2 continuing to make reference to aerodrome safeguarding per page 44, point 'F' of the extant LDP and retention of Policy 19. We would also support retention of Map 3 as a clear and concise visual guide to airport related considerations. Please note that we are currently undertaking a periodic review of Instrument Flight Procedures, as required by the European Aviation Safety Agency, and may issue an updated safeguarding map in due course.</p> <p>The airport supports retention of the 57 decibel (16 hour) threshold. The airport recommends that any potentially noise sensitive development within this contour is accompanied by a noise assessment. Guidance is available from Professional Practice Guidance on Planning and Noise for New Residential Development (published by the Association of Noise Consultants, Institute of Acoustics and Chartered Institute of Environmental Health). The noise assessment should inform whether the proposed development is acceptable and what, if any, mitigation (noise insulation) measures should be incorporated. In terms of which plan this should be based on, the airport has actual (2017) noise contour mapping, and will publish an updated masterplan in 2020 which will include indicative future contours for 2028 and 2040, all of which can be provide to the Council. In terms of the LDP considering a 10 year period, the 2028 plan may be most appropriate.</p> <p>The relevant part of Policy 19 could therefore be refined to: <i>“Noise sensitive development (including residential) within the noise contours for Glasgow Airport, shown on Map 3, should be accompanied by a noise assessment considering acceptability and any mitigation requirements. The contours are based on the indicative 2028 57-decibel (16- hour) contour published in the Glasgow Airport Masterplan.</i></p> <p>Should the structure of policy be reviewed?</p> <p>No responses</p>	
<p>Planning Authority response</p>	
<p>The Main Issues Report did not include any specific questions on the minor areas of change. These were included for information purposes. However, a number of comments were made on these, all of which have been considered as part of the preparation of the Proposed LDP 2. The Proposed Plan is subject to consultation, with all representations being considered by a Reporter on behalf of Scottish Ministers. This provides a final opportunity for comments.</p>	

What is not changing? – Comments

Community Area/Policy Theme	What is not changing? – Comments
Elements of the engagement included:	<ul style="list-style-type: none"> • Questionnaire • Drop In Session • Email responses
List of Organisation(s) commenting on this topic	
<ul style="list-style-type: none"> • Waterside Community Council 	
Planning authority's summary of comments:	
<p><u>Kirkintilloch Community Area - Site S315 Waterside Bing</u></p> <p>Deborah Carmichael - We see that the company that owns the Waterside Bing (S315) would like to take away the spoil and put in more industrial units on the resulting cleared site. The Waterside or Wallace's Bing is one of the few relics of the Scottish mining industry and is an important part of our industrial heritage and one we believe could play a greater role in local industrial tourism, as it is the object of the Kirkintilloch Heritage Trail. Locals and others use it for recreation and fitness. It is currently a Local Nature Conservation Site, and amphibians and deer are to be seen there, among other wildlife species. Should the Bing be demolished or developed I believe the extra traffic load on the only road through the village would likely bring about damage to old cottages, a huge increase in traffic would cause road damage already an issue in many parts of the roads in Waterside and especially Pit Road, and would also cause huge disruption and vehicle pollution to residents.</p> <p>Waterside Community Council - We see that the company that owns the Waterside Bing (S315) would like to take away the spoil and put in more industrial units on the resulting cleared site. The Waterside Bing is the last remaining large coal bing in East Dunbartonshire – a relic of the Scottish mining industry, which was one of the largest industries in Central Scotland, employing thousands of people. The Waterside Bing is therefore an important part of our industrial heritage and one we believe could play a greater role in local industrial tourism. Locals and others use the bing for recreation and fitness, climbing it to burn up the kilos and to admire the views (including of the beautiful working farms on the Gartshore estate, with their seasonal crops and their grazing cows and sheep). It is currently a Local Nature Conservation Site, and amphibians and deer are to be seen there, along with many other wildlife species and birds of prey. In addition to the wildlife, fossils from hundreds of millions of years ago can be found at the bing. The bing is also a landmark of interest to the passengers, commuters, tourists and shoppers using the Glasgow to Edinburgh railway line, thousands of whom pass by it each day.</p> <p>Waterside Community Council also believes that were the spoil to be removed via Bankhead Rd, the only road into and out of the village, this would likely bring about damage both to the old cottages bordering it and to the road itself, owing to the heavy lorries and loads required to do this. It would also cause enormous disruption and increase vehicle pollution, with consequent negative health impacts on residents.</p>	
Planning Authority response	

The Council's options for this site, including the reasons for not allocating the site for business use, are set out in the Monitoring Statement (p167). The Proposed Plan is subject to consultation, with all representations being considered by a Reporter on behalf of Scottish Ministers. This provides a final opportunity for comments.

General Comments

Community Area/Policy Theme	General Comments
Elements of the engagement included:	<ul style="list-style-type: none"> • Questionnaire • Drop In Session • Email responses
List of Organisation(s) commenting on this topic	
<ul style="list-style-type: none"> • Homes for Scotland • Kirkintilloch Community Council • Lenzie Community Council • NHS Greater Glasgow and Clyde (NHSGGC) 	
Planning authority's summary of comments:	
<p><i>Summary of comments from individuals:</i></p> <p>Consultation format</p> <ul style="list-style-type: none"> • Documents should be easier to read and digest for members of the public, so more people can contribute • Express appreciation to staff who prepared plan and were at drop in session, who were courteous and helpful. • I found it surprising when looking at the MIR Questionnaire that the 8 issues directly associated with Climate Change were squeezed together into one response box (Issues 40-47) in spite of the wide and varying topics addressed. It was impossible to give one over-arching Yes or No answer, as you will have seen from my issue-specific responses above. • Issues 44, 45, 46 and 47 were not summarised at all (unlike all other Issues in the MIR) and, whilst I appreciate that these topics are lengthy, I fear that many respondents might have found themselves pushed to select Yes or No for all the Climate Change Issues, especially when referring to the online form. <p>Buildings and Development</p> <ul style="list-style-type: none"> • Does the sandstone quarry to the west create pollution and if so is its future use in doubt? • Considers the flats at Craighdu Road unsightly and queries who passed them. • Developers are not concerned about local people only profit, e.g. re development of library and community centre site. <p>Community Facilities</p> <ul style="list-style-type: none"> • We need an accessible local medical hub at St Joseph's. • Reminds Council it is here to represent the people, this seems to have been forgotten. • Make adequate provision for education of our young people. <p>Transport</p> <p>In addition to the comments received on transport, which have been addressed through respective Main Issues, a number of comments were also received on specific transport and travel issues facing people of East</p>	

Community Area/Policy Theme	General Comments
	<p>Dunbartonshire. In Torrance, it was requested that active travel links were improved and a more frequent bus service was available. The volume of speeding drivers coming in and out of Torrance was also raised as an issue. It was requested that there is a Next bike (bike sharing) station in Kirkintilloch and other locations in East Dunbartonshire. It was requested that the 142 circular bus in Bishopbriggs passes and stops at Huntershill Village. Getting to Stobhill Hospital by bus from Lennoxton was difficult due to the need to change bus at Kirkintilloch.</p> <p>In general, it was requested that public transport was made free for everyone and that promotion of public transport may attract more people to use it. It was also requested that the Council introduce a Workplace Parking Levy</p> <p><i>Summary of responses from groups and organisations:</i></p> <p>Lenzie Community Council - For previous plans, we had more of a special introduction for Community Councils and had hard copies of the documents, which made it somewhat easier to understand what the reports were saying. I looked at the MIR online and identified sites under consideration in our area. However, these appeared to include some sites which we thought had already been discarded - specifically the proposed Meadowburn Avenue development immediately to the west of Initiative Road and a site bordered by Lindsaybeg road and Initiative Road to the east of Initiative Road. Because of the difficulty of cross-referring to other documents, I visited Lenzie Library to read the documents and was surprised to find that they were different from the ones I had been looking at online. It looks like I picked up the wrong link. The Library did not seem to have a copy of the Monitoring Report.</p> <p>Kirkintilloch Community Council - Before providing detailed response, can I firstly show our thanks for offering up a report where much of what the community feels is important is already reflected in the document. The community has clearly expressed its views as to what it would like to see and these have been well reflected in your approach. It would probably therefore be pertinent to be clear on how the views of the community have been collated. Between November 2017 and March 2018, Kirkintilloch Community Council (Your Kirky) undertook a significant Community Engagement Exercise. This programme of engagement enabled local people, businesses and a range of local interest groups to take part in conversations about the town. The delivery of the consultation was widely seen as very successful. Through a variety of methods the views of over 1,500 people in Kirkintilloch and surroundings were captured.</p> <p>Homes for Scotland - Homes for Scotland does not comment on individual sites, so our comments on Issues 2-32 are limited. However, the Council will recognise that objectives relating to such matters as the health of town centres, regeneration and community facilities are reliant on home building more generally, and we refer again to the economic and social benefits that new housing can provide. This relationship does not appear to have been fully taken account of in the MIR. Moreover, there are various repeated references under Issues 2 – 32, as referred to under Issue 1 above, implying that greenfield development is inherently unsustainable. Taking one example, for Bearsden (and repeated in respect to other communities) when referring to greenfield development, it is stated that: “This option will compromise the broader city region strategy of focussing on regeneration, sustainable development and prioritising the development of brownfield land over greenfield where at all possible. Therefore, the risks to the city region strategy and environmental protection are considered to outweigh the benefits of this option.”</p>

Community Area/Policy Theme	General Comments
	<p>Respectfully, this statement is not entirely accurate. The Clydeplan strategy for enabling the provision of new homes explains that it “will be realised through the prioritisation of regeneration activities, the recycling of previously used land, and higher density development in support of the delivery of the Plan’s compact city model” (para. 6.24). This clearly does not preclude consideration of greenfield sites. Indeed, the next paragraph makes clear they have a role to play in enabling the delivery of new homes, noting that “The strategy also includes a range of large scale planned greenfield sites including the Community Growth Areas, released through earlier plans and either still under development or still to commence, as well as a range and choice of other greenfield and brownfield sites.” (Para. 6.25).</p> <p>This is also supported by Policy 8 which deals with the housing land requirement and steps to be taken where a shortfall in five-year housing land supply arises. It clearly contemplates that planning permission could be granted for housing developments on “greenfield or brownfield” sites. Greenfield development is therefore not inconsistent with Clydeplan nor is its acceptability contingent upon all other brownfield land in the city region having been exhausted. In Homes for Scotland’s view, therefore, the manner in which a number of the Reasonable Alternative Options are stated in Issues 2 – 32 misrepresents the city region strategy by concluding that the allocation of greenfield sites is unsustainable.</p> <p>NHS Greater Glasgow and Clyde (NHSGGC) - As already highlighted within the MIR, East Dunbartonshire has a higher than average older population, which added to the existing pressures of health and social care provision. It is therefore critical that NHSGGC and the HSCP work closely with the Council and other public and 3rd sector partners in relation to the impact on developments on the healthcare estate and the delivery of services. The Older Peoples and Specialist Housing Research study commissioned by the Council and HSCP will also provide further data and analysis on this matter. The development of an integrated health and social care centre proposal in the West Locality (Bearsden & Milngavie) to provide further integration of health and care along with GP and third sector services in line with the national policy direction is a key strategic issue for the HSCP. The proposal would provide a range of health, social care and third sector services for the population under one roof and would be more accessible than the current facilities. The proposal would afford the opportunity to provide modernised health and social care facilities. This proposal is currently being assessed by NHSGGC and the HSCP.</p>
Planning Authority response	
	<p>Comments from Individuals</p> <p>A number of comments related to issues unrelated to the Main Issues and/or matters outwith the scope of the main issues report and LDP process. In relation to the consultation format, this feedback is noted and will be considered for future consultation procedures.</p> <p>Transport</p> <p>General comments received on specific transport issues will be addressed through the Local Transport Strategy (LTS). The LTS sets out the Council’s transport policy, presents Transport Planning Objectives and sets out a package of actions and interventions intended to enhance travel and transport in the East Dunbartonshire area.</p>

Community Area/Policy Theme	General Comments
	<p>A period of consultation was held in September – November 2019 on the Draft Local Transport Strategy 2020-2025. This period of consultation overlapped with the Main Issues Report consultation. The vast majority of comments received through the MIR consultation were therefore also received and considered through the process of finalising the Local Transport Strategy 2020-2025. Detailed comments received through the Main Issues Report process will also assist the Council in delivering the LTS.</p> <p>Lenzie Community Council</p> <p>Officers attended an information session with Lenzie Community Council as part of the consultation process. The Council encourages the use of electronic versions of consultation documents, but acknowledges that not all people will have access to digital/online platforms. For this reason, limited copies are placed in local libraries. Note that not all background documents are placed in libraries for logistical reasons, however these can be requested from the main planning office where required.</p> <p>Kirkintilloch Community Council</p> <p>Noted</p> <p>Homes for Scotland</p> <p>The Council's response in relation to housing matters is provided under issues 33-37.</p> <p>NHS Greater Glasgow and Clyde (NHSGGC)</p> <p>Noted</p> <p>The Proposed Plan is subject to consultation, with all representations being considered by a Reporter on behalf of Scottish Ministers. This provides a final opportunity for comments.</p>

5. Next Steps

The results of this period of consultation will help shape the contents of the Proposed LDP2, which is scheduled for publication and consultation in 2020. Following the end of the proposed LDP 2 public consultation period, the Council will consider all responses and then submit the Proposed LDP 2, together with any unresolved representations, to the Scottish Government for examination. This is an independent review process carried out by a Reporter appointed by Scottish Government Ministers. Only once the Examination has been completed can the Council proceed with adoption of LDP 2. Full details of the LDP 2 preparation process are set out in our [Development Plan Scheme](#). This is updated annually.