

## PROPOSED LOCAL DEVELOPMENT PLAN 2 REPRESENTATION FORM 2020

### Representation Period: 19 October 2020 to 15 January 2021

Completed representations must be received by **5pm on 15 January 2021**

East Dunbartonshire Council is now inviting representations on its Proposed Local Development Plan 2 (LDP2). These can be supportive comments or objections. The Council is also inviting comments on the following documents:

- Environmental Report
- Proposed Delivery Programme
- Proposed Sustainability and Energy Statement Form
- Additional Site Assessments for Nine Sites Submitted During the Main Issues Report Consultation in 2019.
- Habitats Regulations Appraisal

These documents, and further information on how to make a representation, are available to view on the [Council website](#) and in Community Hubs/ Libraries (subject to reopening in line with COVID-19 restrictions). You can also call the Land Planning Policy Team for advice on 0300 123 4510.

Please use this form to submit your comments on the Proposed LDP2 or any of the above documents.

When completed, please e-mail to [development.plan@eastdunbarton.gov.uk](mailto:development.plan@eastdunbarton.gov.uk) or post to: Land Planning Policy Team, Broomhill Industrial Estate, Kilsyth Road, Kirkintilloch, G66 1TP

#### IMPORTANT PRIVACY NOTICE:

- **All data that you provide on this form will be held and processed in accordance with the requirements of the General Data Protection Regulations 2018.**
- **Representations cannot be treated confidentially and may be passed to the Scottish Government's Directorate for Planning and Environmental Appeals as part of the Examination of the Proposed Plan.**

#### CONTACT DETAILS

Name:	{REDACTED}
E-mail address:	{REDACTED}
Postal Address (optional):	
Company/Organisation (if applicable):	Mcnally Associates
Client (if applicable):	{REDACTED}

**YOUR REPRESENTATION – please enter your comment(s) in the space below. You only need to use one form for all your comments on the consultation documents.**

Please can you ensure that your response:

- Is concise
- States clearly which document you are commenting on, uses page numbers and policy or site reference numbers. This will ensure it is clear what your representation is regarding. Headings can be used to provide this information.
- State clearly whether you support or object to the policy or proposal. If objecting, please state clearly how you think the plan/policy should be changed.

Please see attached representation relating to the site at Hunter Road, Milngavie.

Appendix 1: Site Location Plan

Appendix 2: Letter from Dickie & Moore Homes confirming housebuilder interest in the site

Date:

15/01/2021

**THANK YOU – END OF REPRESENTATION FORM**



Our Ref : TMCI/JL

15 January 2021

Land Planning Policy Team  
East Dunbartonshire Council  
Southbank House  
Strathkelvin Place  
Kirkintilloch  
G66 1XH

Dear Sirs,

**SITE AT HUNTER ROAD, MILNGAVIE : STATEMENT OF OBJECTION  
EAST DUNBARTONSHIRE LOCAL DEVELOPMENT PLAN 2**

**Up front and for the avoidance of doubt, this representation objects to the non-inclusion of the site at Hunter Road, Milngavie as a new housing site (for affordable elderly housing) in the emerging East Dunbartonshire Local Development Plan. As the plan progresses it is submitted that this site should be identified and zoned for residential purposes (for affordable elderly housing). It should be noted that as part of the proposed residential development, a section of the wider piece of land owned by our clients would be designated as open space / community woodland.** We would propose that, in order to enhance and protect this space, a woodland management plan and sinking fund could be applied to this portion of the site. We would propose that the residential development would help to fund the enhancement of this area which has the potential to be a significant asset to the local community. The exact detail of this could be agreed through discussions with the Council; however improvements to be discussed could include upgrading / resurfacing of the footpath and cycleway through the woodland area.

**SITE DETAILS AND PROPOSALS**

**Location of site for proposed development :** Land at Hunter Road, Milngavie

**Current land use :** Vacant grassed land

**Proposed land use :** Residential development ( affordable housing developed exclusively for the elderly)

The proposed site comprises of approximately 2 hectares of vacant grassed land bounded to the east by Hunter Road, north by open space with woodland beyond and to the south and west by existing residential units.

**P L A N N I N G & D E V E L O P M E N T C O N S U L T A N T S**  
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Directors: Tom McInally Dip.T.P. MRIPi HonFRAS (Managing Director), Mrs R. McInally (Company Secretary), Scott Graham BA, (Hon) MRIPi (Associate Director)

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Plans of the exact location and proposals for the aforementioned development are enclosed as **Appendix 1**.

At the outset, it is important to note the intended use of the site is for affordable flatted residential units – developed exclusively for the elderly. It is submitted that there is a considerable demand for this type of development which will encourage diversity within the local housing market.

Development of this nature will provide additional housing in an area of East Dunbartonshire where there is high demand for new housing and will also encourage the downsizing of residents living within Milngavie. Furthermore, open space will form part of the proposals. The inclusion of open space facilities within the proposal will support the community in providing spaces and links to recreation and outdoor activities within the area.

In addition, it is considered of significance to note that there is housebuilder interest in the site (see **Appendix 2**).

#### **NATIONAL PLANNING POLICY**

In terms of Scottish Planning Policy it is submitted that the site at Hunter Road, Milngavie represents a sustainable option by providing a much demanded alternative type of affordable residential development for the elderly. Scottish Planning Policy Document (2014), paragraph 132 states:

##### ***“Specialist Housing Provision and Other Specific Needs***

***As part of the HNDA (Housing Need & Demand Assessment), local authorities are required to consider the need for specialist provision that covers accessible and adapted housing, wheelchair housing and supported accommodation, including care homes and sheltered housing. This supports independent living for elderly people and those with a disability. Where a need is identified, planning authorities should prepare policies to support the delivery of appropriate housing and consider allocating specific sites.”***

In response to the policy above, it is submitted that the development proposal for the site at Hunter Road, Milngavie will help East Dunbartonshire Council deliver on the Scottish Governments commitment to support independent living for elderly people and those living with a disability.

Furthermore, the site is considered highly sustainable and is located in close proximity to both public services and public transport. PAN 75: Planning Transport states the recommended guidelines for accessibility for housing to public transport is ***“less than 400m to bus services and up to 800m to rail services”***. Whilst accessibility to local facilities guidelines recommends that ***“a maximum threshold of 1600m for walking is broadly in line with observed behaviour”***. In line with the above, the table below demonstrates that the

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site at Hunter Road, Milngavie is located within close proximity to both public transport and local facilities making the development proposal both accessible and sustainable.

	<b>Approximate Distance in Meters</b>
Bus Stop	Adjacent to site
Milngavie Train Station	1500
Core Path/ Cycleway	100
Local Shops	300
Clober Primary School / Douglas High School	500/800
Community Facilities	500
Milngavie Health Clinic	1500
Milngavie Town Centre	1500

In addition this representation is promoting the management of a section of existing open space / woodland and will also provide a new road and formal footpath linking the housing site to public transport. In these circumstances development at Hunter Road, Milngavie for the uses envisaged can be seen to be in compliance the sustainability guidance offered in National Planning Policy.

#### **EFFECTIVENESS**

It is of significance to note that this site was previously part of a wider planning application (TP/ED/14/0673) submitted on the 9<sup>th</sup> September 2014 which promoted residential development on the wider area of land owned by our client. In this regard, it should be noted that the following studies were submitted as part of the planning application package:

- Statement on design of drainage and SUDS
- Habitat and Protected Species Survey
- Initial transport advice
- Tree Survey and arboricultural constraints
- Desk Based Archaeological Assessment
- Flood Risk Assessment
- Topographical Survey

The aforementioned studies have proven the effectiveness of the wider site. It is submitted that these studies remain applicable to the smaller section of the site (subject to this representation) and can be produced if required.

In terms of the criteria for assessing the effectiveness of a housing site this can be found within PAN 2/2010 entitled "Affordable Housing and Land Audits".

In this regard PAN 2/2010 advises as follows:

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***“The effectiveness of individual sites should be determined by planning authorities in the light of consistent interpretation of the following criteria and through discussions with housing providers. The aim is to achieve a realistic picture of the available effective land supply which can contribute to the housing requirement so that the level of additional housing, and therefore land needed to meet the overall requirement, can be established. To assess a site or a portion of a site as being effective, it must be demonstrated that within the five-year period beyond the date of the audit the site can be developed for housing (i.e. residential units can be completed and available for occupation), and will be free of constraints on the following basis:***

- ***ownership: the site is in the ownership or control of a party which can be expected to develop it or to release it for development. Where a site is in the ownership of a local authority or other public body, it should be included only where it is part of a programme of land disposal;***
- ***physical: the site, or relevant part of it, is free from constraints related to slope, aspect, flood risk, ground stability or vehicular access which would preclude its development. Where there is a solid commitment to removing the constraints in time to allow development in the period under consideration, or the market is strong enough to fund the remedial work required, the site should be included in the effective land supply;***
- ***contamination: previous use has not resulted in contamination of the site or, if it has, commitments have been made which would allow it to be developed to provide marketable housing;***
- ***deficit funding: any public funding required to make residential development economically viable is committed by the public bodies concerned;***
- ***marketability: the site, or a relevant part of it, can be developed in the period under consideration;***
- ***infrastructure: the site is either free of infrastructure constraints, or any required infrastructure can be provided realistically by the developer or another party to allow development; and***
- ***land use: housing is the sole preferred use of the land in planning terms, or if housing is one of a range of possible uses other factors such as ownership and marketability point to housing being a realistic option”***

As demonstrated in the studies which accompanied planning application TP/ED/14/0673, and subject to further required studies and appropriate mitigation the land at Hunter Road, Milngavie that is subject to this representation can be considered free from physical and infrastructural constraints, not contaminated, does not require deficit funding and is considered highly marketable.

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In addition, it is considered of significance to note that there is housebuilder interest in the site (see Appendix 2).

## MAIN ISSUES REPORT

In relation to the site at Hunter Road, Milngavie the Main Issues Report provided the following assessment :

### **"Assessment Summary:**

*The site is unsuitable for development for the following reason(s):*

- *Site is entirely within Local Nature Conservation Site: Craigton Woods*
- *Loss of Open Space: Craigton Wood*
- *Green belt function and defensibility (medium/high)*

### **Additional SEA commentary:**

- *Site is within a locally important Garden and Designed Landscape (Mains) identified as having high biodiversity value.*
- *Potential contaminated land within the vicinity of the proposal site due to former uses as a quarry.*
- *Good access to bus stop with frequent service, core path network and local schools. However with the majority of local amenities and services not within the vicinity the site will not support active travel participation could potentially increase unsustainable travel methods and related emissions levels impacting adversely on local air quality.*
- *Potential removal of mature trees and removal of access path to existing residential area on Falloch Road linking Craigton Woods LNCS and access to the area of open space (proposed as development opportunity).*

### **Proposed Mitigation Measures / Suggested Alterations:**

- *Enhanced active travel network through wooded area*
- *Culvert runs through wood and meets culverts from Mains Estate, then culvert flows to Allander Water. Flooding and drainage guidelines should be followed, in addition to hydraulic model on culvert.*
- *Surface water risk to east*
- *Landscaping should create and maintain a diverse woodland edge habitat. A buffer to the woodland and woodland edge would also be required, however this may result in lack of space to accommodate development.*
- *Noise Impact Assessment potentially required – traffic*
- *Potential archaeological interest relating to below ground deposits of historic farm buildings – requires investigation"*

In response to the above, it is submitted that the site at Hunter Road, Milngavie is not only suitable for development, but presents an opportunity to deliver affordable residential accommodation for the elderly that will help to address the needs of an aging population whilst also delivering a wider community benefit through the inclusion of an enhanced open

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space facility – supporting the community in providing spaces and links to recreation and outdoor activities within the area.

It is of significance to note that there are a number of inaccuracies contained within the statements made in relation to the site at Hunter Road, Milngavie within the Main Issues Report. These are addressed below :

- Although the site subject to this representation is located within Craigton Woods, only a very small section of the site will be lost to the proposed development. The development will create a robust and defensible greenbelt boundary to the settlement of Milngavie, whilst helping to fund the protection and enhancement of Craigton Woods. In order to enhance and protect this space, a woodland management plan and sinking fund could be applied to this portion of the site. We would propose that the residential development would help to fund the enhancement of this area which has the potential to be a significant asset to the local community. The exact detail of this could be agreed through discussions with the Council; however improvements to be discussed could include upgrading / resurfacing of the footpath and cycleway through the woodland area.
- The Main Issues Report identifies that the site has ***“good access to bus stop with frequent service, core path network and local schools”***, however suggests that the majority of local amenities and services are not within the vicinity of the site and would not support active travel. As outlined previously within this representation **all services and amenities (including Milngavie Town Centre, Milngavie Health Centre and other community facilities) are all located within less than 1600m from the proposed development site – in line with the requirements of PAN 75: Planning Transport**. As such, the comment included within the Main Issues Report that the proposed development ***“could potentially increase unsustainable travel methods and related emissions levels impacting adversely on local air quality”*** is considered unjustified.
- In response to the proposed mitigation measures / suggested alternatives, it is submitted that our client is willing to discuss providing the following in relation to any future planning application :
  - An enhanced active travel network through the wooded area
  - Landscaping that would create / maintain a diverse woodland edge habitat and buffer to the woodland and woodland edge
- Furthermore, any future planning application would be accompanied by the appropriate studies to address among other things, flooding and drainage guidelines, hydraulic modelling, surface water risk and noise issues.

#### **BENEFITS OF THE PROPOSED DEVELOPMENT**

- In all regards it is submitted that as outlined in this submission the provision of much required specialist affordable housing would be of significant community benefit.



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- As part of the proposed residential development, a section of the wider piece of land owned by our clients would be designated as open space / community woodland. We would propose that, in order to enhance and protect this space, a woodland management plan and sinking fund could be applied to this portion of the site.
- We would propose that the residential development would help to fund the enhancement of this area which has the potential to be a significant asset to the local community. The exact detail of this could be agreed through discussions with the Council, however improvements to be discussed could include upgrading / resurfacing of the footpath and cycleway through the woodland area.

Given all of the aforementioned and enclosed information the site subject to this objection is considered to be an effective development site capable of delivering the outlined proposals within a short timescale and within the first five years of the emerging East Dunbartonshire Local Development Plan.

**In all regards it is submitted that the site in question (Hunter Road, Milngavie (see Appendix 1)) can be positively considered as an effective development site with housebuilder interest. Given all of the aforementioned this submission objects to the non-inclusion of the site as a new housing site (for affordable elderly housing) in the emerging East Dunbartonshire Local Development Plan. As the plan progresses it is submitted that this site should be identified and zoned for residential purposes (for affordable elderly housing). It should be noted that as part of the proposed residential development, a section of the wider piece of land owned by our clients would be designated as open space / community woodland. We would propose that, in order to enhance and protect this space, a woodland management plan and sinking fund could be applied to this portion of the site. We would propose that the residential development would help to fund the enhancement of this area which has the potential to be a significant asset to the local community. The exact detail of this could be agreed through discussions with the council however, improvements to be discussed could include upgrading / resurfacing of the footpath and cycleway through the woodland area.**

Yours faithfully,

{REDACTED}

{REDACTED} DipTP; MRTPI; Hon FRIAS  
MCINALLY ASSOCIATES LTD  
{REDACTED}

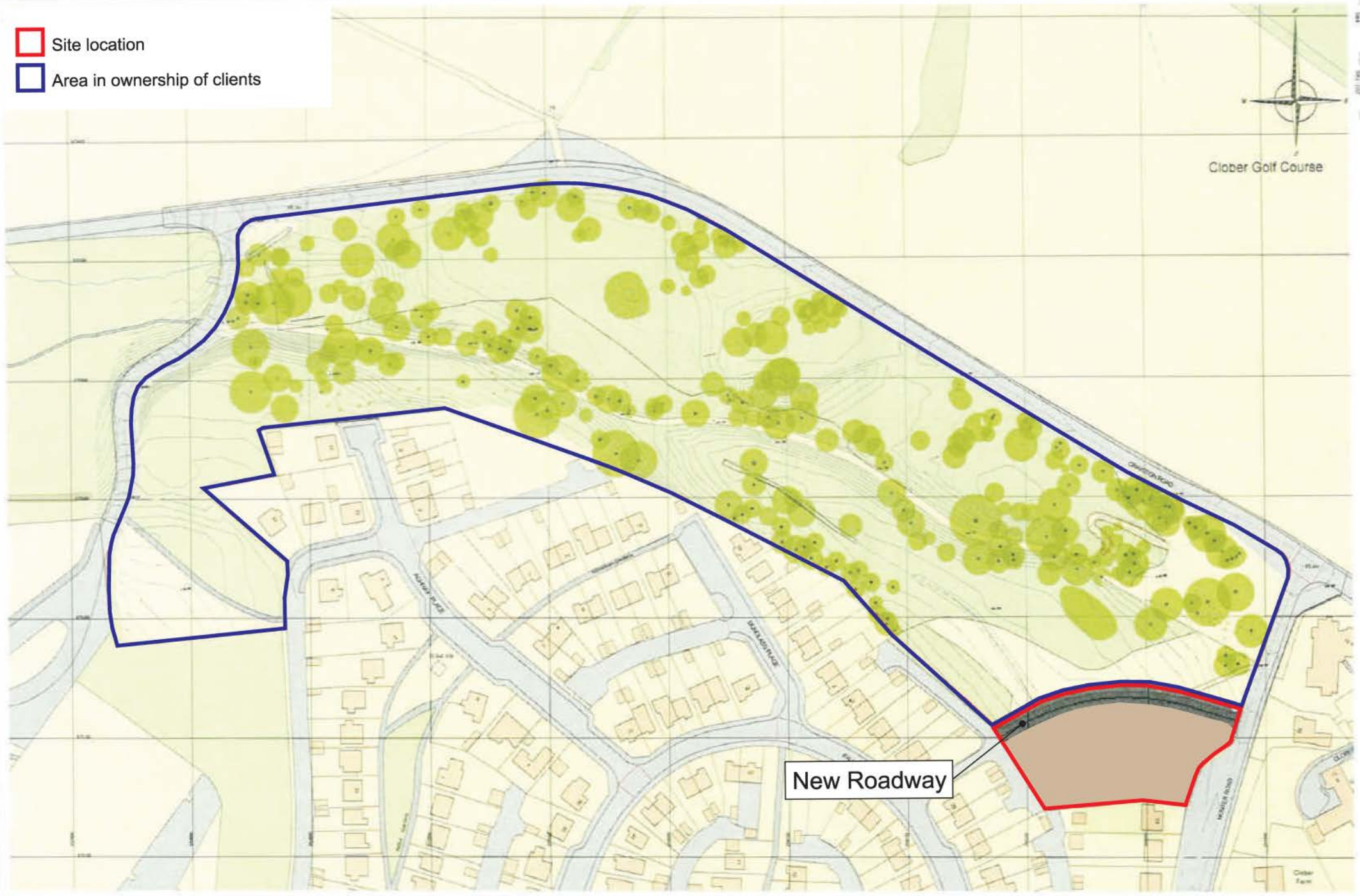
Appendix 1: Site Location Plan

Appendix 2: Letter from Dickie & Moore Homes confirming housebuilder interest

- Site location
- Area in ownership of clients

Clober Golf Course

New Roadway



East Dunbartonshire Council  
Planning Department  
Southbank House,  
Southbank Business Park,  
Kirkintilloch, G66 1XQ.

Dear Sirs

**Hunter Road, Milngavie,**

We would formally confirm our interest in proposed development in accordance with proposals being promoted by McInally Associates.

We believe this site can provide good quality apartments which will widen the current housing mix which is predominantly detached or semi-detached housing.

We have a strong proven track record in central Scotland providing more bespoke developments. Our approach is to work with planning departments rather than try and impose a standard solution. Consequently our developments are accepted as being more attractive than most of current mainstream housing.

If the site is allocated we would welcome early consultation with yourselves.

Yours faithfully

{REDACTED}

{REDACTED}  
Director