

## 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}
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Postal Address (optional):	Barton Willmore Centrum Business Centre 38 Queen Street Glasgow G1 3DX
Company/Organisation (if applicable):	Barton Willmore
Client (if applicable):	CALA Homes (West) Ltd.

**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.

This representation submission form has been prepared by Barton Willmore on behalf of CALA Homes (West) Ltd to promote the residential allocation of land at Old Mains Farm, Milngavie, and object to certain aspects of the Proposed Plan Document. It should be read in conjunction with the accompanying supporting submission document and all associated technical reports provided.

The proposal is for 180 dwellings, mixed tenure flats, terraces, semi and detach homes ranging from 1 & 2 bed flats, to 2 & 3 bed terrace all the way up to 5 bed detached houses. Circa 45 (25%) of the homes being provided will be affordable housing.

This site has been promoted previously through the process relating to the adopted LDP and was viewed favourably by both East Dunbartonshire Council and the Examination reporter. It was accepted that development here would not have significant landscape impact and was a logical expansion to the urban area of Milngavie. It was also concluded that ecology would not be impacted to any notable detriment and that the access was achievable.

The site was identified as an allocation at the proposed plan stage for the adopted LDP. However, due to concerns regarding flood risk, the site was not allocated as a housing site within the adopted LDP. Notwithstanding this setback, CALA have promoted the site again through the development plan process, with submissions to the Call for Sites and Main issues Report Stages.

Despite the information presented, we note that the site has not been presented within the Proposed Local Development Plan 2 as a housing allocation site. The reasons given are primarily due to technical aspects primarily focussed on flood risk and Environmental Habitat concerns.

In response to this, CALA have produced an updated FRA which accords with current SEPA guidance and the revised proposals have been designed to take account of a 1:200 year flood event + 55% allowance for climate change, reducing the flood risk to negligible.

The site is in a strong market area, with significant demand for new homes.

Sustainability is at the heart of the proposals. The site is accessible not only by car but has substantial connections to the surrounding area and core paths for ease of travel by pedestrians and cyclists. The proposed footpath links to surrounding roads provides easy access to existing public transport networks.

The proposals include for protecting and enhancing the existing ecological heritage of the site through the creation of a biodiversity corridor along the Craighdu Burn, reinstatement of the formal gardens and enhanced woodland planting along the southern boundary of the site.

The site can be contained effectively within the existing landscape context of Milngavie, with no risk of coalescence.

The LVIA concludes that the proposed development would have a low impact on wider landscape, with the surrounding landscape actually screening and creating a natural bowl for the Development. Due to the contained nature of the site the delivery of this development would sit well within the existing Milngavie settlement, reinforcing the edge of the greenbelt and protecting the strategically important green space of the Craighdu Wedge.

The accompanying Transport Assessment has concluded there is adequate capacity from the existing roundabout for an upgraded Chestnut Lane and a development up to 200 units.

The submission is accompanied by a robust Tree Survey and CALA propose implementing a Woodland Management Plan to protect and enhance the existing woodland around the site.

Given the above, and as demonstrated by the technical assessment set out within this representation, the site is considered to be a suitable site for housing development and a logical expansion of the settlement. All of the previous concerns reported through the Examination of the adopted LDP, and through the recent Site Assessment, can be addressed and there is no reason – planning, technical or commercial – why the site should not be allocated for development.

If the Reporter agrees that additional housing allocations are required within LDP2 - as per the Housing Land Supply Statement provided - we would strongly urge them to support the allocation of this site. Our proposals are robust, are backed up by a full suite of technical reports and detailed designs which address all identified site constraints, and can be readily delivered in the life of the plan.

With regards to the proposed plan document, we formally **OBJECT** to it being adopted in its current format, in particular, we object to the following aspects of the plan:

1. We object to the approach taken through Housing Background Report and request that it be re-visited to take into account the recommendation in the accompanying Housing Land Supply Statement;
2. In addition to the above, we object to the content of Policy 12 of the Proposed LDP as it has been prepared as a result of the housing background Paper;
3. Further Housing land should be allocated to address the shortfall assessed across the East Dunbartonshire Area and each housing sub-market area;
4. There is a requirement for East Dunbartonshire to allocate additional housing sites to address the identified shortfall in the Greater Glasgow North and West housing sub-market area which is 3,373 private sector homes.
5. We object to the non-inclusion of the Old Mains Site in the list of housing sites under Policy 6H and recommend that it be included to assist in meeting the identified shortfall of housing land required;
6. We object to the ongoing designation of the land at Old Mains Farm, that is the subject of this representation, within the proposed Local Development Plan as Green Belt and request for it to be re-designated and allocated as a housing site under policy 6H.

Accordingly, we respectfully request that the Reporter overturns the latest position of East Dunbartonshire Council; seeks for the approach to housing land to be rectified; and allocates this site for housing development, with an indicative capacity of c.180 units.

We would also request that the Examination reporter(s) consider all of the submissions made on behalf of our client throughout the emerging LDP2 process. This representation should be read in conjunction with previous submissions made at Call for Sites and Main Issues Report stages. It should be noted however that all technical work has been updated including the site layout, which takes account of the following technical documents that support this submission:

- » Housing Land Assessment
- » Landscape Assessment
- » Flood Risk Assessment
- » Ecology Assessment
- » Transport Statement
- » Tree Survey

Date: 15 January 2021

{REDACTED} – Planning Associate

**THANK YOU – END OF REPRESENTATION FORM**