



The Planning Manager  
East Dunbartonshire Council  
The Triangle  
Kirkintilloch Road  
Bishopbriggs  
G64 2TR

20 November 2009

Dear Sir

**East Dunbartonshire Local Plan 2 – Finalised Draft Consultation  
Objections on behalf of Hendersons Surveyors**

We enclose six objections to the East Dunbartonshire Local Plan 2 – Finalised Draft consultation, on behalf of our client Hendersons Surveyors. Please note that one of the objections promotes a new site for inclusion in the Local Plan.

Additionally, please find enclosed the client's and our (agent) details for registering these submissions.

We hope that the information presented is to your satisfaction. All documents have been sent via email to the specified address prior to the expiry of the deadline.

Yours sincerely

**Bob Salter**  
**Geddes Consulting**

## East Dunbartonshire Local Plan 2 – Finalised Draft Consultation Registry Details

Client's details:

<b>Name</b>	Mr Eddie Henderson
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Our (agent) details:

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# East Dunbartonshire LP2 Finalised Draft Objection on behalf of Hendersons Surveyors



## *Objection 1*

**Category** Local Plan 2;

**Chapter in LP2** Proposals Map

Addition of Settlement Envelopes around all towns in the Local Plan

**Comment** The Local Plan Proposals map uses 'Village Envelopes' to define the urban context of four villages.

The Local Plan however does not delineate a settlement boundary around its major towns to differentiate between the urban edge and the countryside beyond.

Instead, it uses the inner boundary of the Green Belt to undertake this purpose. This is not the role of the Green Belt inner boundary to delineate urban edges or settlement envelopes.

An examination of the Green Belt's inner boundaries demonstrates that there are many examples of land uses in the Green Belt which are urban in character and would be designated as part of a settlement.

This approach is contrary to policy guidance from Scottish Government. Many parts of these inner Green Belt boundaries are weak and do not have strong physical features in the landscape. Again this does not accord with guidance from Scottish Government.

The use of a settlement boundary for these towns would be consistent with the Village Envelopes already used in this Local Plan. The same form of designation could be used with 'Village Envelope', simply amended to 'Settlement Envelope'.

The definition of 'Settlement Envelopes' would also assist in defining terms such as 'infill sites' which is already in use in policies such as Policy HMU 1.

Any 'Settlement Envelope' which is drawn should incorporate urban uses from within the current Green Belt leading to a redefinition of the inner Green Belt boundary in accord with Scottish Government policy. This inner boundary would be separately drawn to meet the requirements of SPP 21 or Scottish Planning Policy if approved by Scottish Government.

This would be in accord with the approved Structure Plan (Strategic Policy 1).

# East Dunbartonshire LP2 Finalised Draft Objection on behalf of Hendersons Surveyors



## *Objection 2*

**Category** Local Plan 2;

**Chapter in LP2** Proposals Map

Green Belt inner boundary reviewed to accord with Scottish Government guidance

**Comment** The Local Plan draws its Green Belt boundary tightly against the existing urban edge of its major towns and too often, incorporates urban uses within the Green Belt. The Local Plan also includes four villages as part of the Green Belt.

The Scottish Government is clear in its guidance in SPP 21: Green Belts and the Consultative Draft SPP on the Green Belt. For this Local Plan, the following policy needs to be taken into account:

- Green belt designation is not to prevent development happening (para.120);
- Land should only be designated as green belt where it will contribute to the settlement strategy for an area (para.120);
- Not all greenfield land will be designated as green belt (para. 120);
- Green belts should reflect the long term settlement strategy (para. 122);
- Green belts should ensure that settlements are able to accommodate planned growth (para. 122);
- Inner boundaries should not be too tightly drawn around the urban edge (para.122);
- Inner boundaries should where appropriate, create an area suitable for planned development between the existing settlement edge and green belt boundary (para.122);
- Green belt boundaries should be clearly identifiable on the ground using strong landscape features (para.122);
- Existing settlements should be excluded from green belt designations (para.122);
- Major uses such as airports, business, education and research should be excluded from the green belt (para.122).

The referencing adopted is from the Draft SPP but the policy is equally applicable from SPP 21.

The Local Plan's current and proposed Green Belt boundary is contrary to this policy requirement. For example, the Green Belt designation should be removed from within the village envelopes of Balmore, Bardowie, Clachan of Campsie, and Haughhead. There are many other examples.

The modification of the Green Belt boundary to meet these requirements would be in accordance with the approved Structure Plan (Strategic Policy 1).

## Green Belt around Torrance

The Green Belt boundary around Torrance largely ignores the available strong physical features in the landscape, preferring to hug the built edge.

There are several groups of buildings and houses on the urban edge which are part of the town but in the Green Belt, as well as the local playing field in its wooded setting.

The River Kelvin is an obvious choice for the boundary to the south east of Torrance.

This Green Belt boundary should be reviewed and a new inner boundary established which accords with Scottish Government requirements.

A proposal to the Green Belt boundary has been made to the Council as part of the objections to the Local Plan.

# East Dunbartonshire LP2 Finalised Draft Objection on behalf of Hendersons Surveyors



## *Objection 3*

**Category** Local Plan 2;

**Chapter in LP2** Proposals Map

Addition of 'Countryside' designation

### **Comment**

The Local Plan does not have a 'Countryside' designation or policy because of the extensive use of the Green Belt and its policy framework for development management purposes.

The extensive area shown on the Proposals Map in the north of East Dunbartonshire, designated as 'Campsie Fells and Kilpatrick Hills' is effectively 'Countryside'. It is the only area in the Local Plan which is not in the Green Belt (other than the major settlements).

The proposed policy framework for this Local Plan is such that if the site is in the Green Belt then unless there is an occupancy need for residential development, it is not possible to promote development in most of East Dunbartonshire.

This policy stance is contrary to policy requirements from Scottish Government as stated in SPP 15: Planning for Rural Development (Feb 2005). Greater encouragement should be stated in the Local Plan which promotes rural development – housing, economic and tourism uses.

This Local Plan fails to address many of the requirements set out in the SPP 15.

This can only be addressed through the Green Belt boundary review in the first instance to clarify whether there should be an area within which a 'Countryside' policy can apply.

Development within the countryside would be governed by a development management policy which meets the requirements set out in SPP 15. There are many examples of this type of policy – this policy is promoted as another objection to the Local Plan.

# East Dunbartonshire LP2 Finalised Draft Objection on behalf of Hendersons Surveyors



## Objection 4

**Category** Local Plan 2;

**Chapter in LP2** Chapter 7 Green Belt

Addition of a 'Development in the Countryside' Policy

## Comment

The Local Plan does not address development in the countryside – other than to presume against it through the use of the Green Belt designation and Policy GB 1.

The designation on the Proposals Map of 'Campsie Fells and Kilpatrick Hills' draws together a number of policies but none specifically relate to the proactive and promotional policy requirements set out in SPP 15.

Chapter 7 Green Belt should be amended to 'Green Belt and Countryside'. This sets the necessary context for this broader based chapter.

The following policy is proposed to be added to take account of the omission of a 'Countryside' policy from the Local Plan and allow the Local Plan to accord with SPP 15.

### ***Development within the Countryside***

*Development in the countryside will only be permitted if:*

- A.** *It is required for the furtherance of agriculture, including farm related diversification, horticulture, forestry, countryside recreation, tourism, or waste disposal (where this is shown to be essential as a method of site restoration); or*
- B.** *It is a designated non-conforming use in the Green Belt (Policy GB -2 Excepted categories of Development); or*
- C.** *It accords with the following development category:*

### ***C1 Housing Groups***

*Where there are clearly identifiable groupings of 3 or more houses in close proximity, already located in the countryside and outwith settlement envelopes, it may be possible to supplement these with additional dwellings subject to the following criteria:*

- a)** *The location is outwith the Green Belt*
- b)** *The location is close to local services (school, shops) and/or has access to regular public transport service giving access to such facilities;*
- c)** *The new home(s) fit in the landscape and are of a character and scale appropriate to the existing units;*

- d)** *The new home(s) are capable of being served by an adequate and appropriate access;*
- e)** *The new home(s) are capable of being provided with drainage and a public water supply at reasonable cost, or an alternative acceptable private water supply, and avoid unacceptable discharge to watercourses;*
- f)** *The new home(s) incorporate sustainable elements in the building design;*
- g)** *The new home(s) enhance the landscape and appearance of the existing group of buildings; and*
- h)** *The new home(s) will not result in ribbon development and the plot size/width should be similar to the other units within the group.*

*Housing groups to which this policy may apply must form a cohesive entity. The new unit should generally be located within gaps in the group.*

*All development within the countryside will need to:*

- A.** *Be of scale and character appropriate to the rural area;*
- B.** *Be well integrated into the rural landscape;*
- C.** *Take account of accessibility to public transport and services (where appropriate).*

*In certain locations, new or expanded business development, low density rural housing, the winning of mineral resources or renewable energy developments may be appropriate).*

Supporting text will also be required

# East Dunbartonshire LP2 Finalised Draft Objection on behalf of Hendersons Surveyors



## Objection 5

**Category** Local Plan 2;

**Chapter in LP2** Chapter 3 Housing & Mixed Uses

Omission of evidence relating to whether affordable housing needs in the Local Housing Strategy have been met in full and whether this Local Plan maintains a 5 year effective land supply from the date of adoption of this Local Plan

### Comment

This Local Plan does not need to provide for a strategic housing requirement as set out in the approved Structure Plan.

This has been assessed at the point of approval of the Structure Plan. It has been concluded that the strategic requirement can be met from the effective land supply.

This Local Plan however is required to meet a number of other policy requirements as set out in SPP 3: Planning for Homes (Revised 2008) and restated in the Draft Consultation Scottish Planning Policy (SPP).

Among the requirements of this policy, this Local Plan needs to ensure the following:

- Delivery of housing through the development plan depends on appropriate and effective sites being made available to meet need and demand (para.54);
- Planning authorities should ensure that sufficient land is available to meet the housing requirement for each housing market area in full (para.56);
- A supply of effective land for at least the following five years should be maintained at all times (para.57);
- Development plans should identify triggers for the release of future phases of effective sites such as where ... a 5 year effective land supply is not being maintained (para.57);
- Delivery of housing does not solely on the allocation of appropriate land in the development plan (para.58);
- As with market led housing development the need for affordable housing should be met where possible within the housing market area which it has arisen (para 65).

The approved Structure Plan allows this Local Plan to allocate greenfield and indeed, limited incursions into land designated as Green Belt is permitted to meet its affordable housing needs.

No evidence has been presented in the Local Plan to confirm that it has maintained its effective 5 year housing land supply at all times.

No evidence has been presented to ensure that the Local Plan has allocated

sufficient land to meet the outstanding affordable housing requirements, identified in its Local Housing Strategy.

Until these assessments are clarified, the Council is unable to confirm whether the allocations in the Local Plan (HMU table) are adequate to meet these national policy requirements. The Local Plan needs to ensure that it meets the overall housing requirement set by the approved Structure Plan over its local plan period.

A specific proposal has been made for a site at Ralston, Torrance to meet these outstanding requirements to accommodate a further 30 new homes.

This proposal should be added to the HMU Table A or B, depending on the needs to be met.

This allocation is in accord with the approved Structure Plan.

**Torrance**

**Objection 6**

on behalf of



to the

**East Dunbartonshire Local Plan 2 -  
Finalised Draft**

November 2009

prepared by

**geddes** consulting



This Objection has been prepared on behalf of Hendersons Chartered Surveyors for consideration by East Dunbartonshire Council as an objection to the Local Plan 2.

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## Development Plan Context

East Dunbartonshire Council is seeking responses to the East Dunbartonshire Local Plan 2 - Finalised Draft.

Hendersons Chartered Surveyors is promoting a small site of 1.2ha at Torrance for residential development.

The site is part of the Green Belt in the adopted Local Plan although it lies immediately adjacent to the settlement edge.

Scottish Government Policy on the Green Belt has changed significantly since the Local Plan was adopted.

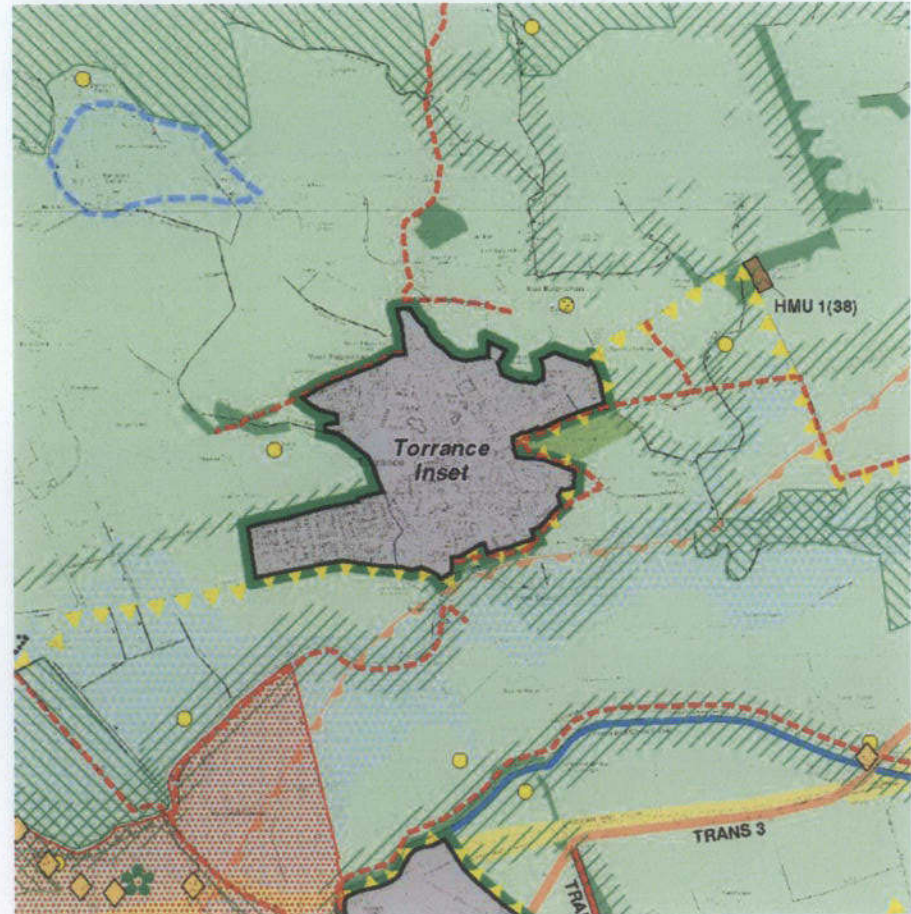
In particular, local plans now need to ensure that the inner boundaries of Green Belts should not be drawn too tightly around the urban edge but where appropriate should create an area suitable for planned development between the existing settlement edge and Green Belt boundary.

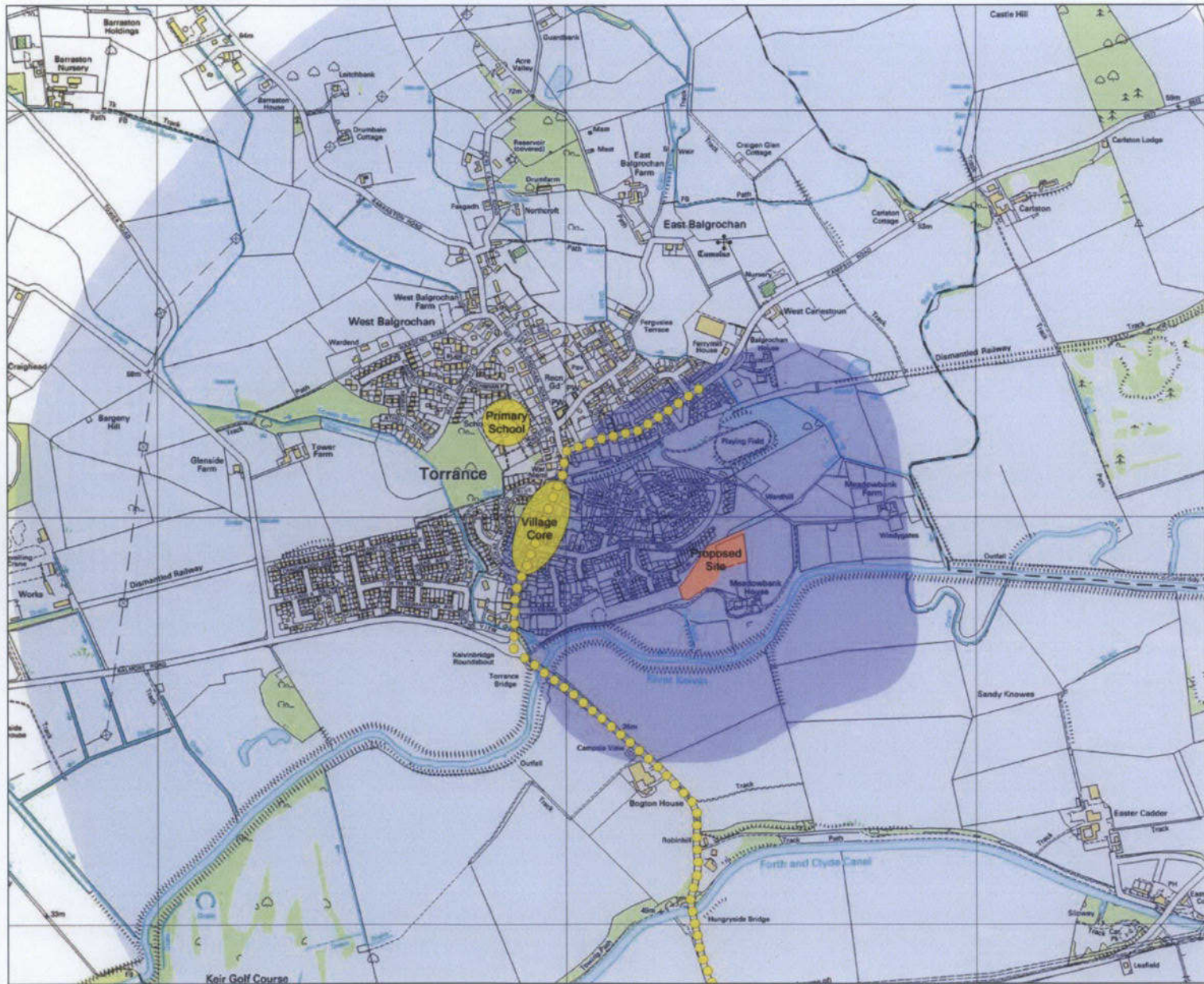
Green Belt boundaries should be clearly identifiable on the ground using strong visual or physical features such as rivers, tree belts, railways or main roads and landscape features that form a horizon.

This guidance is stated in SPP21: Green Belts and also in the forthcoming replacement Scottish Planning Policy.

As a consequence, the Local Plan should examine its inner Green Belt boundary around all of its settlements including Torrance. This would allow future development without the need to continuously review its Green Belt boundaries over the next 20 years. This is in accord with the approved Structure Plan.






Allowing settlements to expand around their urban edge over the next 20 years is a requisite of the development strategy for East Dunbartonshire.







## Masterplanning Principles

-  the site
-  area within an easily walkable 400m from site
-  area within a walkable 1600m from site
-  local facilities
-  bus route

### Torrance

Torrance had a population of nearly 2,500 in 2001. The villages such as Torrance need ongoing investment to continue to support a vibrant community.

The Finalised Local Plan has not identified any new greenfield sites for development under Policy HMU1. It continues to maintain a Green Belt boundary tightly drawn against its urban edge. This inner boundary includes urban uses such as several groups of houses and buildings plus the local playing field in the Green Belt.

Additional development in Torrance will continue to support village services and activities, creating opportunities for new community facilities as well as providing land for affordable housing.

### The Site

The site is approximately 1.2 hectares and is arable farmland with limited biodiversity.

This site offers excellent pedestrian links to the village centre and primary school.

The existing bus service passes along Main Street and is within 400m of the site, which is an easy walking distance.

Local amenities such as the health centre, garage, post office, grocers, the local primary school (Torrance Primary) and local recreation facilities are all within walking distance of the proposed site.

The site forms a natural extension to the existing built form without encroaching into the flood plain of the River Kelvin.

The boundary of Green Belt around Torrance still needs to be examined to take account of Scottish Government policy on the Green Belt. The River Kelvin provides the strongest physical boundary on the south of Torrance and is an obvious physical feature to adopt as a revision to the Green Belt boundary.







The site is at the edge of the Antonine World Heritage Site Buffer Zone.



0 25 50 100



## Proposal

-  site 1.2 hectares / 3.0 acres
-  structure landscape
-  housing allocation (0.8ha)
-  open space
-  SUDS pond
-  pedestrian links

The site can accommodate around 30 homes and would be affordable homes, provided by either public and private sectors.

Access will be off the adjacent road (Kelvins Way) to the Council's specification.

The proposal links into the existing pedestrian paths into the village, primary school, and public open space.

The design concept will be to create a pedestrian priority in the development, where shared surfaces will give priority to pedestrian movement over traffic circulation.

Proposals for greenspace and SUDS pond will enhance biodiversity and connect with existing surrounding habitat.

This development will contribute to the generation of electricity from renewable sources and will meet more stringent energy efficiency standards.

The location of the proposal would be in accord with Policy HE 1B since it would not have an adverse impact on the Antonine Wall or its setting because the inter visibility is mitigated by Meadowbank House and its landscape setting.



## Benefits to the Community

This new development provides opportunities to sustain the vitality of a village like Torrance:

- It provides new affordable homes to meet local housing needs
- It generates additional population to support existing shops, the primary school, facilities and services

The addition of 30 new homes is needed to meet local housing needs and demand over the Local Plan period as identified in the Local Housing Strategy.

### Effective Development

It is now necessary to demonstrate that sites can be effective during the Local Plan period. Advice about the deliverability of the proposal such as availability of services and infrastructure has been sought.

This advice confirms that the site can be developed within the Local Plan period, and is effective. Detailed studies will be commissioned in consultation with the Council to support the allocation of the site in the Local Plan such as Drainage Impact Assessment, and Flood Risk Assessment.

### Modifications to the Local Plan

The Finalised Local Plan does not present a spatial strategy for future investment in Torrance. This is also supported by the approved Structure Plan (Strategic Policy 1) and its guidance on releasing land from the Green Belt to meet affordable housing needs.

The Green Belt is still too tightly drawn against the urban edge of Torrance. This means that no land releases are planned on greenfield sites over the period of the Local Plan and beyond.

The Council needs to consider its Green Belt inner boundary and revise it to allow necessary investment in Torrance to meet known needs.

The River Kelvin is recommended as the physical feature to adopt in reviewing the Green Belt inner boundary to the south east of Torrance.

Meadowbank House and its landscape setting provide the mitigation measures to allow this development to proceed in accord with Policy HE 1B.

If you wish to know more about this development, please contact either:

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