Planning and Environmental Appeals Division

The Scottish Government

REPORT TO NORTH LANARKSHIRE COUNCIL ON THE NORTH LANARKSHIRE LOCAL DEVELOPMENT PLAN MODIFIED PROPOSED PLAN EXAMINATION

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Examination of conformity with the participation statement

Legislative context

1. Section 19(4) of the Town and Country Planning (Scotland) Act 1997 (as amended) requires the person appointed by Scottish Ministers to firstly examine whether the council has consulted and involved the public in the plan's formulation, in the way it said it would in the participation statement which was current at the time of the proposed plan's publication.

2. Councils are required to produce a development plan scheme at least annually. The development plan scheme should include a programme for the preparation and review of the plan, and must contain a participation statement. The planning authority is then required to adhere to its commitments in the participation statement in regard to when, how and with whom consultation takes place.

The participation statement

3. The North Lanarkshire Development Plan Scheme 2018 was in place at the point at which the modified proposed plan was published. Section 6 of this document is entitled 'Participation statement and engagement strategy'. However, the development plan scheme confirms that the participation statement is a separate stand-alone document.

4. It is against this stand-alone participation statement that the council's conformity must be assessed. The participation statement was last updated in April 2016. Unlike the development plan scheme, it has not been reviewed and updated annually. As the participation statement is an essential component of the development plan scheme (as required by Section 20B(4)(c) of the 1997 Act (as amended)), the requirement to keep the development plan scheme under at least an annual review would logically apply to the participation statement also, whether or not provided as a separate document.

5. As a consequence of the participation statement having not been updated since April 2016, it takes no explicit account of the modified proposed plan stage, which would not have been foreseen when the participation statement was produced. However, I am satisfied that the participation statement made sufficient overarching commitments to engagement methods throughout future stages of plan production, to enable me to assess the extent to which the modified proposed plan stage conformed with these commitments. The council has referred me to appendix 2 of the participation statement, which lists proposed engagement methods and the broad stages to which they apply.

6. The participation statement sets out the council's intentions broadly for how it would consult and engage on the proposed plan, and I consider these must be considered as commitments to be applied equally to the modified proposed plan. This means that regardless of the actions undertaken by the council to consult and engage upon the original proposed plan, this would not discharge their responsibilities to also adhere to the same commitments in relation to the modified proposed plan.

7. Whilst I find the participation statement to be deficient to some extent, because it has not been reviewed and updated annually, I am not required to examine the adequacy of the participation statement itself. My role is to examine the extent to which the council has conformed with its commitments in the participation statement, and I find the

commitments in appendix 2 of the participation statement provide an adequate basis to carry out this examination of conformity.

8. The Act restricts this examination of conformity with the participation statement to consideration of the adequacy of consultation and public engagement in respect of the proposed plan (or in this case, the modified proposed plan), rather than the extended plan preparation process.

The report of conformity

9. Section 18(4)(a)(i) of the Act (as amended) requires the council to submit a report to demonstrate the extent to which it has satisfied the provisions of section 19(4), outlined in paragraph 1 above. Accordingly, North Lanarkshire Council has submitted a 'Statement of Conformity with Participation Statement'.

10. This statement provides an overview of all consultation stages during the plan's preparation. In regard to the modified proposed plan, the precise steps taken by the council are set out in appendix 2 of the statement of conformity, listed against the commitments and actions applicable to this stage of plan preparation intimated in appendix 2 of the participation statement.

Reporter's conclusions

11. The participation statement listed a range of actions and engagement methods which would apply to various stages of the plan's production. I have reviewed this list of actions to identify those which could reasonably be expected to apply to the modified proposed plan stage.

12. Having done this, I am satisfied that where the council has identified "what we said we would do" in appendix 2 of its statement of conformity, this does encapsulate the relevant actions from the participation statement, applicable to the modified proposed plan.

13. The only potential exception to this is where the participation statement states that the council would have stands at local events throughout the plan's formulation. However, I note that the participation statement also clarified that undertaking this action did not need to coincide with consultation periods, and so I consider that this was a broader commitment rather than specific (or essential) to the modified proposed plan stage.

14. The council, in its statement of conformity, has provided details of a variety of actions and activities to demonstrate an adequate level of consultation and engagement on the modified proposed plan. I asked the council to provide further evidence in this regard, to substantiate the council's position.

15. The evidence subsequently provided by the council demonstrates that the council did undertake consultation and engagement activities with adequate alignment with its commitments in the participation statement. Of particular note, over and above statutory notifications, was the council's approach to informing the Local Area Partnerships through a series of presentations.

16. The council has confirmed that no representations were received which raised concerns regarding the adequacy of consultation. I find this adds weight to my finding that the council has adequately complied with the commitments in its participation statement.

This is despite my reservations over the participation statement itself, which I have outlined above. The examination of the modified proposed plan can therefore proceed.

Christopher Warren
Reporter

Issue 001	**Introduction, Vision & Appendices**	
Development plan reference:	Introduction & Vision Appendices Pages 9-22, and 134-156	**Reporter:** Christopher Warren
Body or person(s) submitting a representation raising the issue (including reference number):		
Gartcosh Tenants & Residents Association (179) Brian McGinty (183) Ogilvie Homes (189) Dawn Homes (206) Wallace Land Investments (220) Taylor Wimpey (225) Albert Bartlett & Sons (Airdrie) Ltd (242) Modern Housing Group (243) Goldcrest Partners LLP (246) Scottish Government (255) Miller Homes (258) Trustees of Miss ID Meiklam (262) Homes for Scotland (266) Scottish Power (275) Coatbridge LVA LLP (276) Rhiannon Properties Ltd (286)		
Provision of the Development Plan to which the issue relates:	Introduction, How the Plan Works, Supporting Documents Vision, National and Regional Context, Planning Policy Context, North Lanarkshire Context, Spatial Strategy Appendices - Guidance, Housing Land Requirements, Housing Land Audit 2017, Industrial Land Survey 2017, Glossary All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		
Gartcosh Tenants & Residents Association (179) objects to how the Housing Land Requirement was calculated on grounds that no account appears to have been taken of recent consents on unallocated land which have not yet been built out as such sites still contribute to meeting the housing land requirement and reduce the need for land to be allocated, and concern is raised regarding the implications of a very generous housing land supply on North Lanarkshire's capacity to cope with that level of development as a result, in particular Gartcosh which has experienced significant pressure from residential development with insufficient investment in infrastructure, community facilities and open green space. Brian McGinty (183) objects to Introduction, Vision and Appendices but does not state on what grounds. Ogilvie Homes (189); Goldcrest Partners LLP (246); Trustees of Miss ID Meiklam (262); Rhiannan Properties Ltd (286) object to the wording of the third paragraph under heading "Vision, Spatial Strategy, Focus on Places" on grounds it is ambiguous and lacks clarity. Dawn Homes (206) objects to the Council's proposed Housing Strategy as set out within		

the Appendices ('Housing Land Requirements') on grounds it does not accord with Clydeplan (AD59) and as such Scottish Planning Policy (SPP) (AD60) in so far as: it fails to demonstrate it provides sufficient land to meet the requirements of Schedule 8 of Clydeplan (AD59), as demonstrated in Table 2 of the Modified Proposed Local Development Plan (MPLDP), it does not evidence delivery up to 2029 as required; the figures in Table 6 of the MPLDP are incorrectly stated for each Sub-Market Housing Area (HSMA) and are not compliant with Policy 8 and Schedule 10 of Clydeplan (AD59).

Wallace Land Investments (220) objects to matters raised under heading "Supporting Documents, Guidance" on page 12 of the Plan, on grounds that the Council has failed to provide any indication/clarity as to when and what process will be followed in terms of the production of Guidance on Contributions to Infrastructure and Environmental & Design Qualities, demonstrating the lack of an express commitment to keep all guidance which supports the plan under regular review, and requests all interested parties are fully involved and engaged in this process.

Taylor Wimpey (225.283; 225.300 and 225.306) and supporting documents RD152-158, objects to North Lanarkshire Council's strategy on housing land allocations as it does not allocate a sufficiently generous amount of housing land and many of the sites that are allocated are not considered to be demonstrably effective, as such land at Branchal Road, Cambusnethan (283) (SM019); land at Whitehill Farm, Stepps (300) (SM020) and land at Meldrum Mains, Glenmavis (306) (021) should be removed from the Green Belt and allocation as Proposed Housing Development site(s).

Albert Bartlett & Sons (Airdrie) Ltd (242) objects to the "Introduction and Vision" section of the Plan on the grounds the Plan does not recognise the synergy of development consented and proposed at Land at Drumshangie Moss (SM018), including for housing, specialised business and the potential (through a proposed new policy in this Plan) provision for a new Monkland Hospital site, which should be acknowledged as a strategic development location.

Modern Housing Group (243) and supporting document RD204, objects to the Council's proposed Housing Strategy as set out within the Appendices (Housing Land Requirement) on grounds it does not accord with the provisions of Clydeplan (AD59) and therefore Scottish Planning Policy (AD60), specifically Table 2 of the MPLDP, and fails to evidence it has allocated a range of sites which are effective or expected to become effective to meet the Clydeplan requirements up to 10 years from the expected year of LDP adoption. With regard to Table 6 of the MPLDP, the HLR for each SMHA is incorrect and reflects instead the Housing Supply Target.

Scottish Government (255)

<u>Placemaking Policies - PP1A Purpose of Place Policy and PP1B Purpose of Place Policy</u>

Objects to Policy PP1A on the grounds that the policies set out a sequential approach that differs significantly from that required by paragraph 68 of Scottish Planning Policy (AD60). The plan places "local centres" third in the sequential order, after edge of centres (which includes edge of 'large centres') whereas in Scottish Planning Policy (AD60) they are in the first tier. The introduction of a classification of "Large Centres" and "Business Centres" a term which is neither in, nor complies with Scottish Planning Policy, and to Policy PP1B on the grounds that the Modified Proposed Plan does not categorise any of its Centres as "Commercial Centres."

Placemaking Policies - AD1A Amount of Development Policy and AD1B Amount of Development Policy

Objects to Policy AD1A requiring an assessment of impact of proposals for shops (over 5,000 m^2) within a Strategic Centre as this is not consistent with Scottish Planning Policy (SPP) (AD60), and to Policy AD1B, as the policy requires an assessment of impact for proposals or shops over 2,500m^2 in Town and Local Centres. This approach is not consistent with Scottish Planning Policy, which only requires impacts on assessments outwith town centres.

Disused Railway Lines

Objects on grounds Paragraph 277 of Scottish Planning Policy (SPP) (AD60) requires development plans to safeguard disused railway lines with a reasonable prospect of being reused as rail, tram, bus rapid transit or active travel routes.

Active Travel Exemplar

Objects on grounds Paragraph 5.14 of National Planning Framework 3 (AD61) encourages all local authorities to develop at least one exemplar walking and cycling friendly settlement to demonstrate how active travel networks can be significantly improved in line with meeting the Scottish Government's vision for increased cycling.

Opportunities for home-working, live-work units, micros-businesses and community hubs

Objects on grounds Paragraph 95 of Scottish Planning Policy (AD60) requires plans to encourage opportunities for home-working, live-work units, micro-businesses and community hubs as a means to support the transition to a low carbon economy and a positive and flexible approach to town centres, housing design and integrated place making.

Opportunities for integrating efficient energy and waste innovations

Objects on grounds Paragraph 96 of Scottish Planning Policy (AD60) requires plans to support opportunities for integrating efficient energy and waste innovations within business environments.

Differentiation between Policy and Guidance

Objects to the Policy and Guidance statements in the Plan on the grounds that a number of statements in the Guidance read as policy statements, such as PROT B Guidance Historic Environment Assets, and greater clarity should be given to differentiating between these.

Glossary- Historic Environment

Objects to the definition on page 153 of the glossary references heritage designations on grounds it does not cover the full range of historic environmental assets included in SPP.

Appendices - Housing Land Requirements

Objects to the Plan's reference to 'balance of private and social components' on page

138 in relation to Affordable/Market Housing, the appropriate terminology for this is 'affordable and market sector'.

Objects to wording on page 139 of the Plan (Step 1) in relation to the Housing Needs Demand Assessment (HNDA) (AD68), the affordable and market split within the Housing Supply Target are informed through the HNDA process, not the toolkit.

Objects to wording on page 140 of the Plan relating to the Housing Supply Target (HST), first paragraph, second sentence, on grounds that the HST is a view of the number of homes to be delivered over the plan period not the actual number of homes that are needed, and the use of the term 'land target' is not consistent with the terminology used in SPP.

Objects to the use of four tables on pages 140/141 of the Plan, representing two different methodologies in relation to how the plan addresses the issue of housing land supply, this has the potential to cause confusion, and to the sentence "To date, Scottish Government has not advised which methodology to be used, so both are presented in the Modified Proposed Plan" as Paragraph 118 of SPP (AD60) sets out that it is the responsibility of the Local Authority to demonstrate that the plan meets the HLR and that there is a minimum of 5 years effective land supply.

Objects to the omission of the exact source of the sub-Local Authority figures, reference should be made to the source in the Plan. Objects to the omission of 'housing estimate' on page 138 paragraph 3 following the word 'methodology', this better reflects what was agreed robust and credible by the Scottish Government's Centre for Housing Market Analysis.

Objects to the calculation between step 5 and 6 on page 139 of the Plan, for the 'private' component as the figures are not consistent with the table on the same page, and the reasoning for the change in the 'social' component is also unclear.

Miller Homes (258) objects to the Council's Housing Land Methodology and how the figures are presented across Tables 1-4 on page 140-141, the purpose and relevance of Tables 5 & 6 on page 142, a number of the figures are incorrect, and the identification of housing land only covers a 9 year period following adoption- not the 10 year period required by SPP paragraph 119 (AD60), as such the figures need to be amended across the tables to reflect this.

Objects on grounds that Table 1 does not take into account Demolitions planned as part of North Lanarkshire's Ambition Programme, past completions, and site effectiveness.

Homes for Scotland (266) and supporting documents RD235-237:

<u>Vision</u>

Objects to the 'Vision' on grounds that it does not clearly explain how the identified challenges North Lanarkshire faces will be addressed.

<u>Appendix Tables 5 & 6 (p.142) 5 year effective land supply methodology</u>

Objects to the approach taken by the Council to calculate the five years' supply, the methodology is not explained, and the inclusion of the text below both tables 5 & 6 "being

introduced by Heads of Planning Scotland (HOPS)" on grounds it is ambiguous.

Appendix: Housing Land Requirement

Objects to the location of the Housing Land Requirement in the Appendix and not in the main body of the Plan, the use of different methodologies as set out in the Tables on pages 140-142 of the Plan, on the basis they are confusing and not clearly explained, and the figures in columns 7, 8 and 9 of Tables 1-4 are incorrect and Table 5 & 6 are inaccurate throughout.

Appendix: Housing Land Supply

Objects to Appendix: Housing Land Supply on grounds that there are major deficiencies in the land supply, concerns over the effectiveness of many sites in the North Lanarkshire Council's Housing Land Supply and no annual programming for the LDP period is provided to explain the assumptions behind it.

Scottish Power (275) and Coatbridge LVA LLP (276) object to the omission of identified 'Noise Management Areas' in the Map Book.

Modifications sought by those submitting representations:

Gartcosh Tenants & Residents Association (179) seeks the reduction of land allocated for development and the re-allocation of parts of NLSK0442A (Mapbook 7.3) as open space or for community use.

Brian McGinty (183) offers no modification.

Ogilvie Homes (189); Goldcrest Partners LLP (246); Trustees of Miss I D Meiklam (262); Rhiannan Properties Ltd (286) seek the deletion of the third paragraph.

Dawn Homes (206) seeks amendment of the Modified Proposed Local Development Plan so it is compliant with Policy 8 of Clydeplan (AD59), including all tables and evidence accordingly.

Taylor Wimpey (225.283, 225.300 and 225.306) and supporting documents RD1525-158, seek the allocation of additional land for housing to meet the identified housing land shortfall.

Wallace Land Investments (220) seeks the insertion of the wording at the end of the paragraph titled "Guidance" on page 12 of the Plan:

"All of the Supplementary Guidance/Non-Statutory Guidance and other items of back ground information which supports the provisions of the Plan will be kept under regular review and that any required updates to this suite of guidance/information will be subject to full and appropriate consultation with all relevant stakeholders an interested parties."

Albert Bartlett & Sons (Airdrie) Ltd (242) seeks on page 19 'North Lanarkshire Context,' between paragraph's 6 and 7, the insertion of the following text: "Land at Drumshangie Moss in East Airdrie represents a strategic location for mixed-use development, much of which is already committed, and will be further transformed with the arrival of the Pan-Lan Orbital. The potential relocation of the New Monklands Hospital provides further evidence

as to the strategic importance with which this area is being viewed," and on page 19 'Challenges,' paragraph 5 should be corrected to read: "Maintaining a minimum 5-year effective housing land supply at all times in each of North Lanarkshire's three Housing Sub-Market Areas will be necessary essential to achieve the potential population growth."

Scottish Government (255)

PP1A Purpose of Place Policy and PP1B Purpose of Place Policy seeks that Policies

PP1A Purpose of Place Policy and PP1B Purpose of Place Policy should be updated to more closely align with the sequential approach required by SPP. Specifically, the policies should be updated to:

- remove the 'large centres' from the first tier of the sequential approach;
- amend both 'large centres' and 'business centres' to 'other commercial centres' and place them into the third tier in the sequential approach;
- add 'local centres' into the first tier in the sequential approach;
- amend the 'edge of' centre to follow the wording in SPP ('edge of town centre')

AD1A Amount of Development Policy and AD1B Amount of Development Policy

Seeks that Policies AD1A Amount of Development and AD1B Amount of Development should be updated to remove requirements for impact assessments for sites within town centres.

Disused Railway Lines

The plan should include a consideration of disused railway lines if applicable.
Active Travel Exemplar The plan should identify at least one exemplar walking and cycling friendly settlement.

Opportunities for home-working, live-work units, micros-businesses and community hubs

The plan should encourage opportunities for home-working, live-work units, micro businesses and community hubs. This could be identified and referenced as part of Place Making policies.

Opportunities for integrating efficient energy and waste innovations

The plan should support opportunities for integrating efficient energy and waste innovations within business environments. This could be identified and referenced as part of Place Making policies.

Differentiation between Policy and Guidance

Seeks greater clarity between Policy and Guidance.

Glossary-Historic Environment

Seeks an amendment to the Historic Environment Assets definition to read as follows:

"International, national and local heritage designations to protect world heritage sites,

listed buildings and structures, historic gardens and designated landscapes, historic battlefields, conservation areas, scheduled monuments and undesignated archaeology" and consider individual definitions for each Historic Environment Asset in the Glossary as the PROT Policy groups them altogether.

Appendices-Housing Land Requirements

Seeks an amendment to the MPLDP where relevant to use the correct terminology in relation to the separation of housing tenures, such as the removal of 'private and social components' and replace with affordable and market sector' housing.

Seeks an amendment on page 139 of the Plan (step 1) to reflect that affordable and market sector estimates are derived through the HNDA process, not through the HNDA toolkit.

Seeks an amendment on page 140 of the Plan (first paragraph, second sentence) to reflect that the 'Housing Supply Target is a view of the number of homes to be delivered over the plan period', not the 'actual number of homes that are needed'.

Seeks an amendment on page 141 of the Plan (first paragraph) to clarify the reference to 'land target'.

Seeks an amendment to pages 140-141 of the Plan to provide a single view on whether the Plan allocated sufficient land to meet the SDP Housing Land Requirement up to year 10 of expected adoption of the LDP and whether there is a minimum of 5 years effective land supply.

Seeks an amendment to page 141 to remove the sentence "To date, Scottish Government has not advised which methodology to be used, so both are presented in the Modified Proposed Plan'.

Seeks an amendment to page 139 to include the source of the Private Housing Sub-Market Area figures.

Seeks an amendment to page 139 to provide an explanation for the calculation of the 'social' component between steps 5 & 6, and check for accuracy of the calculation between step 5 & 6 of the 'private' component.

Seeks an amendment to the third paragraph on page 138 (under Strategic Development Plan) to read as follows:

"The latest Housing Need and Demand Assessment methodology (housing estimate) was agreed by the Scottish Government's Centre for Housing Market Analysis as "robust and credible" in May 2015.

Miller Homes (258) and supporting document RD221, seeks the removal of Tables 1-6 in the MPLDP and the insertion of Table 1:

Table 1 North Lanarkshire Housing Land Requirement: Clydeplan Methodology

	2012-30 HLR	2012-30 Annual Requirement	2012 – 17 Required Completions	2012-17 Actual Completions	2017-2030-Year Remaining Requirement	2017-30 Supply	2017 -30 Surplus / Shortfall
All Tenure Local Authority	21,950	1,220	6,100	4,673	17,277	?	?
Private Cumbernauld HSMA	4,352	177	885	1,168	3,184	?	?
Private Motherwell HSMA	6,956	300	1,500	1,553	5,403	?	?
Private Airdrie and Coatbridge HSMA	6,088	271	1,355	1,215	4,873	?	?

Modern Housing Group (243) seeks that the MPLDP is amended in compliance with Policy 8 of Clydeplan, with all tables and evidence amended accordingly.

Homes for Scotland (266) and supporting document RD237:

Introduction/Vision seeks the revision of wording within the 'Vision' by providing clarity to how growth in households and supporting economic growth will be addressed, by including reference to the importance of allocating effective housing sites and the £172.5m to be invested through the City Deal as well as how the Council intends to leverage private sector investment from this.

<u>Appendix Tables 5 & 6 (p.142) 5 year effective land supply methodology</u>

Seeks the deletion of Tables 5 & 6 and the wording which supports them, and amend the land supply methodology proposed so it is consistent with Clydeplan and SPP.

Appendix: Housing Land Requirement

Seeks that the Housing Land Requirement takes account of completions to date to ensure consistency with Clydeplan and adjust to cover a 10 year period from the date of anticipated adoption, take account for planned demolitions and INSERT the following table, or similar to the main section of the LDP to show the HLR:

	HLR 2012-24 (A)	Completions 2012-17 (B)	(A-B) Residual 2012-24 HLR (C)	Allowance to Account for Programmed Demolitions* (D)	(C+D) Residual 2012-24 HLR (Including Demolition Allowance) (E)	2024-29 HLR (F)	2029-30 HLR (G)	(E+F+G) 2017-30 HLR
All Tenure Local Authority	14630	4673	9957	1600	11557	6100	1220	18877
Private Local Authority	11590	3936	7654			4830	966	13450
Private Cumbernauld HSMA	2900	1168	1732			1210	242	3184
Private Airdrie and Coatbridge HSMA	4060	1215	2845			1690	338	4873
Private Motherwell HSMA	4640	1553	3087			1930	386	5403

* * It is only proposed to add the allowance for programmed demolitions to the All Tenure Requirement as the tenure split of the is unknown

Appendix: Housing Land Supply

Seeks the inclusion of the full annual programming for sites expected to be delivered over the LDP period so it can be scrutinised, and allocate new effective housing allocations to meet housing shortfall.

Scottish Power (275) and Coatbridge LVA LLP (276) seek the identification of 'Noise Management Areas' on the Map Book.

Summary of response by planning authority:

Gartcosh Tenants & Residents Association (179) - Matters raised regarding Housing Land Requirement are dealt with under Issue 04 PROM LOC 3 Housing Development Sites.

Brian McGinty (183) - The purpose of the Introduction, Vision and Appendices chapter is to set the scene of the Policy Document, and the Appendices are lists of sites.

Ogilvie Homes (189), Goldcrest Partners LLP (246), Trustees of Miss ID Meiklam (262) and Rhiannon Properties Ltd (286) - The purpose of the Introduction, Vision and Appendices chapter is to set the scene of the Policy Document, and the Appendices are lists of sites. The third paragraph clearly sets out the Council's broad interpretation of the Scottish Government's placemaking agenda.

Wallace Land Investments (220) and Albert Bartlett & Sons (Airdrie) Ltd (242) - The matters raised regarding the provision of a replacement University Hospital Monklands are dealt with under Issue 02 PROM LOC 1 Regeneration Priorities.

Taylor Wimpey (225.283; 225.300 and 225.306) - The matters raised regarding the Council's housing land allocations are dealt with under Issue 04 PROM LOC 3 Housing Development Sites and Issue 17 PP 4 Green Belt.

Scottish Government (255)

PP1A Purpose of Place Policy and PP1B Purpose of Place

Policy Matters raised regarding the Council's sequential approach are addressed under Issue 10 PP 1A Strategic Town Centres and Issue 12 PP 1B Town & Large Centres.

AD1A Amount of Development Policy and AD1B Amount of Development Policy

Matters raised regarding the Council's sequential approach are addressed under Issue 11 AD 1A Strategic Town Centres and Issue 13 AD 1B Town & Large Centres.

Disused rail lines

Many of North Lanarkshire's disused railway lines are included in the Core Path Network/Rights of Way benefit from a level of protection already. It has to be recognised that many disused mineral lines are in the Green Belt and Countryside and indistinguishable from their surroundings. Notwithstanding, the Council is undertaking an exercise to map all of the former rail lines by category, with a view to publishing these as part of an expanded Core Path Network.

Active Travel Exemplar

NPF 3 (AD61) "encourages" all local authorities to develop at least one exemplar walking and cycling friendly settlement. The wording is not "should". However, if the Reporter is so minded, the Council would suggest Cumbernauld and the addition of the following text under 'Transport improvements' on Page 117, after paragraph 1, "Cumbernauld is identified as North Lanarkshire's walking and cycling friendly settlement". Cumbernauld, as a New Town, has the separation of pedestrian/cyclist from motorists as a fundamental element of its design and development.

Opportunities for home-working, live-work units, micros-businesses and community hubs

The Council feels that the Amount of Development Policy assessment of appropriateness covers this adequately.

Opportunities for integrating efficient energy and waste innovations

The Council agrees that additional wording would support the policy and improve clarity. If the Reporter is so minded, the Council would suggest the addition of Scottish Planning Policy paragraph 179 (AD60) to the end of bullet point 18 in EDQ 1 Policy Site Appraisal.

Differentiation between Policy and Guidance

The Council disagrees and considers that the Policy is a clear statement of the Council's intent. The associated guidance is a clear statement of how this will be achieved.

Glossary - Historic Environment

The Council agrees. If the Reporter is so minded, the Council suggests the Historic Environment Assets definition in the Glossary on page 153 is amended to read:

"'International, national and local heritage designations to protect world heritage sites, listed buildings and structures, historic gardens and designated landscapes, historic battlefields, conservation areas, scheduled monuments and undesignated archaeology".

Appendices - Housing Land Requirements

If the Reporter is so minded, the Council suggests the following:

That the relevant sections of the Plan are amended to reflect the appropriate terminology of "affordable and market sector" as outlined in paragraph 115 of Scottish Planning Policy (AD60);

To amend wording on Page 139 of the Plan (Step 1) to reflect that affordable and market sector estimates are derived through the HNDA "process", not the HNDA toolkit;

To amend wording on Page 141 of the Plan (first paragraph) from "land target" to "land requirement";

To delete the sentence:

"*To date, Scottish Government has not advised which methodology to be used, so both are presented in the Modified Proposed Plan*" from Page 141

To include the following sentence "The private sector housing sub market area disaggregation percentages are derived from analysis of completions and supply in the three Sub-Market Areas;

To amend Step 6 from 254 to 300. This was a typographical error.

Housing Supply Target; 5-year Housing Land Supply and "Robust and Credible"

The Council considers that its version is more readily understood by the lay person, that the tables presented resulting from the application of two methodologies reflect the issues between different methodologies used in recent and ongoing Examinations and Appeals;

The Council considers that the Plan reflects the Approved Clydeplan Strategic Development Plan page 49, paragraph 6.40 (AD59).

Miller Homes (258) and Modern Housing Group (243) - Matters raised regarding the Council's Housing Land Methodology and proposed Housing Strategy are dealt within Issue 04 PROM LOC 3 Housing Development Sites.

Homes for Scotland (266) - The Council considers that the Vision on page 21 under the heading "*Successful and safeguarded places*" paragraph 1 clearly explains that the Plan's Policies address the economic challenges identified as facing North Lanarkshire. Along with Dawn Homes (203), the matters raised regarding the Council's 5 year effective land supply methodology are dealt with under Issue 04 PROM LOC 3 Housing Development

Sites.

Scottish Power (275) and Coatbridge LVA LLP (276) - The Council stresses that unlike what may be the case elsewhere, there are no "Noise Management Areas" in North Lanarkshire.

Reporter's conclusions:

Introduction – Supporting Documents

1. A representation seeks confirmation in the plan that guidance referred to on page 12 of the proposed plan (relating to contributions to infrastructure, and on environmental and design qualities) will be subject to regular review and stakeholder involvement. The council has not responded to this representation and the suggested modification.

2. I do not find it necessary for the plan to make specific commitments on how other statutory and non-statutory guidance may be produced, and how often it should be reviewed. The production of statutory guidance is already subject to its own regulatory requirements, which would need to be satisfied. The way in which the council approaches non-statutory guidance would be at its own discretion (as it would not be part of the development plan), and so I do not consider it is necessary for the modified proposed plan to specify steps of this nature in the introduction.

3. I note that within the modified proposed plan's appendices, the 'Purpose of guidance' section on page 135 provides further detail on the steps involved in producing supporting statutory and non-statutory documents. It then goes on to identify the intended focus of future guidance and its intended status. We have made some specific recommendations on the status of certain pieces of guidance as part of this examination.

Spatial strategy – Focus on places

4. Representations have sought the deletion of the third paragraph of this section of the Vision, on the basis that it lacks clarity and is ambiguously worded.

5. I tend to agree with representations that this paragraph is rather difficult to understand, and I find that it adds little to the wider purpose and substance of this section of the plan. However, that does not mean that the wording used by the council is inappropriate or deficient. Whilst I consider the wording of this paragraph could be improved in the interests of clarity, I do not find it to be sufficiently problematic to justify recommending its deletion. No modification is required.

Appendices - Housing land requirement and housing land supply

6. Numerous representations have been made, raising concerns and objections to the overall approach to housing land supply matters detailed in in the plan's 'housing land reequirements appendix. The calculations therein are a particular focus of objections. The issues raised are all dealt with as appropriate in issue 4 Housing Development Sites, as that issue considers the full breadth of issues that are relevant to establishing how much housing land is required to be identified by the plan.

7. Those representations which are recorded here in issue 1, but which relate to specific

sites, are all dealt with elsewhere and I have not sought to duplicate findings here. Specifically:

- land at Branchal Road, Cambusnethan is dealt with in issue 17;
- land at Whitehill Farm, Stepps is dealt with in issue 17;
- land at Meldrum Mains, Glenmavis is dealt with in issue 4; and
- land at Drumshangie Moss is dealt with in issue 2.

Placemaking Policies – PP1A Purpose of Place Policy and PP1B Purpose of Place Policy

8. This matter is dealt with in issue 10.

Placemaking Policies – AD1A Amount of Development Policy and AD1B Amount of Development Policy

9. The representation relating to policy AD1A is addressed in issue 11. The representation relating to policy AD1B is referred to in issue 13, which in turn relies upon findings in issue 10.

Disused railway lines

10. Representation 255 from the Scottish Government has objected to the plan's lack of consideration of safeguarding disused railway lines, if applicable, with reference to the provisions of Scottish Planning Policy (SPP) paragraph 277.

11. I note that paragraph 277 of SPP states that disused railway lines should be safeguarded where there is a 'reasonable prospect' of them being reused for transport or active travel purposes.

12. The council has identified that many such routes are already core paths or rights of way. I agree with the council that where this is the case, this provides some degree of protection, whilst also broadly aligning with SPP's intention to see such routes re-used for active travel purposes. I also note the council's intention to expand the core path network using former railway lines.

13. Beyond this, there is no evidence before me which would indicate that there are any specific disused lines which have a reasonable prospect of being reinstated as rail, tram, bus or active travel routes. Had there been particular opportunities of this nature, I would have expected this to have been identified through consultation stages of the plan. The plan does not identify any such former lines and there are no unresolved representations relating to specific former lines. This indicates that there are currently no opportunities provided by former railway lines which would justify specific safeguarding. No modification is required.

Active travel exemplar

14. The Scottish Government representation states that the plan should identify at least one exemplar walking and cycling friendly settlement. This is in the context that National Planning Framework 3 (NPF3), at paragraph 5.14, encourages all local authorities to develop at least one such exemplar. This is to demonstrate how active travel networks can be significantly improved in line with the Scottish Government's vision for increased cycling.

15. I agree with the council that NPF3 does not establish a requirement for local development plans to identify an exemplar settlement. As councils are however encouraged to do so by NPF3, I consider that this signals a certain degree of expectation in national policy that exemplar settlements are to be identified.

16. The council has suggested that Cumbernauld could if necessary be identified as an exemplar settlement in this regard, because it is a New Town which has been designed to separate pedestrians and cyclists from motorists.

17. I am not persuaded that identifying Cumbernauld in this way would add value to the plan in practice. Cumbernauld's design is very much of its time and whilst the segregation between motorists, pedestrians and cyclists may be beneficial in some respects, it may not align with current best practice for creating pedestrian and cycling-friendly settlements. The way in which this separation has been achieved in Cumbernauld could not be practically applied to other settlements in North Lanarkshire, which have developed more organically. In Cumbernauld it is embedded in the design and physical fabric of the town centre, which would not readily translate into an exemplar approach which could be applied elsewhere.

18. There is no evidence before me which would support the identification of an alternative settlement as an exemplar. Consequently, and for the other reasons outlined above, I do not find a modification in this instance would meaningfully address the intended purpose of paragraph 5.14 of NPF3.

<u>Opportunities for home-working, live-work units, micro-businesses and community hubs</u>

19. The Scottish Government representation (255) highlights the requirement for plans to encourage such opportunities, set out in SPP paragraph 95. This is in order to support the transition to a low carbon economy.

20. The council's response above states that "…the Amount of Development Policy assessment of appropriateness covers this adequately." I asked for clarification from the council, through a further information request, on which specific policy or policies encourage developments of these types.

21. On the basis of the council's response to this further information request, whilst I acknowledge that policies should be read together, and that the plan would allow for the types of development referred to by SPP paragraph 95 to be considered, nowhere does the modified proposed plan give explicit encouragement to such developments. I agree with the council that in some instances these uses may be ancillary to another use, but that is unlikely to always be the case, and so reliance on what may or may not be appropriate uses based on defined use classes would not encourage developments of this type.

22. The council has suggested that additional text could be added under the 'Purpose of Place' narrative on page 44, if considered to be necessary. Given the terms of SPP paragraph 95 and the lack of any obvious support in line with its provisions, I agree that this would be a necessary and appropriate modification.

23. I am less inclined to also add an additional bullet point to the 'Assessment of Appropriateness' section of nine separate policies, as suggested by the council. I consider that the additional text referred to above would give the necessary clarity that

support in principle will be given to opportunities of this type, subject to wider locational and other policy considerations. I see no wider practical benefit in expanding the scope of several other policies.

24. The council has also suggested the addition of the words "Moving towards a low carbon economy" to the beginning of policy EDQ 3 (c). I find this would be helpful to contextualise the requirements of the subsequent text. It would also enable the underlying rationale for supporting the types of proposals referred to in SPP paragraph (and in the modification to page 44) to be grounded in this LDP policy.

Opportunities for integrating efficient energy and waste innovations

25. Paragraph 96 of SPP makes clear that development plans should support opportunities for integrating efficient energy and waste innovations within business environments. The representation suggests reference to this could be added to the plan's Place Making policies.

26. The council agrees that additional wording would be appropriate. I do not find the council's suggested inclusion of text from SPP paragraph 179 into policy EDQ 1 would address this same point however. Whilst SPP paragraph 96 cross-references paragraph 179, the focus of this latter paragraph is on promoting resource efficiency and minimisation of waste as a broader principle. I have therefore recommended a modification to the same bullet point as identified by the council, but to include wording which would better reflect SPP paragraph 96.

Differentiation between Policy and Guidance

27. The Scottish Government representation recommends that the plan should provide greater clarity regarding the distinction between policy and guidance.

28. The plan has been structured so that each 'policy' is immediately followed by 'guidance' relating to the policy's implementation. I note that on page 12 of the plan, this relationship is explained under the 'Guidance' subheading as follows:

"The Plan is supported by guidance accompanying each policy. This provides more detail on how to comply with each Policy and how planning applications will be assessed."

29. Confusingly, this 'Guidance' subheading sits below the heading 'Supporting Documents', despite the explanatory text reproduced above outlining the structure of the plan itself.

30. I have had careful regard to the terms of each policy and its related guidance section. In many cases I find that the policy, if taken in isolation from the guidance, would be difficult or even impossible to interpret and apply to individual development management decision-making. The ability to interpret and implement the policies is reliant on the guidance to such an extent that I can see no useful purpose in the policies and guidance being separate from each other.

31. As the above extract from page 12 acknowledges, the guidance explains how to comply with the policy and how to assess proposals. I find that there is a necessity for the practical expectations and requirements of policies to be readily understood.

Alongside this, given the relative brevity and strategic/aspirational nature of many of the policies, I can see no alternative but for the related guidance, in practice, to need to be applied as policy.

32. In this context I find the current differentiation between policy and guidance to be confusing, and as the guidance would need to be applied as policy (and in the main it is already worded in a manner which is consistent with that of policy), it is inappropriate for it to be separated from the 'headline' policy it accompanies. By referring to what are policy requirements as guidance, there is also a danger that development management decisions could give these provisions relatively less weight, introducing unintended scope for greater discretion over how policies should be applied.

33. All told and based on the foregoing, I find it necessary to amend the structure of the plan, so that all related 'policy' and 'guidance' boxes are subsumed to form a single, more comprehensive policy. Consequential minor modifications to the text in some of the current policy and guidance boxes are also necessary to reflect this broader modification. Consequential modifications to the 'Guidance' section on page 12 and the 'Guidance' appendix on pages 135 - 137 are also required.

Glossary – Historic Environment

34. The council has acknowledged that the glossary definition of 'Historic Environment Assets' does not include the full range of assets recognised by Scottish Planning Policy. For consistency with national policy, I agree that the modification suggested in the representation (and also proposed by the council) is necessary.

35. The representation also suggests giving consideration to defining the individual assets identified in the above, expanded definition of historic environment assets. I do not find the absence of such glossary definitions to be a deficiency in the plan, as the assets referred to are all widely recognised and reasonably self-explanatory.

Noise Management Areas

36. Two representations raise objections to the plan on the basis that the accompanying map book (i.e. the proposals maps) does not delineate 'Noise Management Areas'. In response the council has confirmed that there are no such designations in North Lanarkshire currently. This was confirmed in the council's response to a further information request relating to issue 1 and issue 23. No modifications are therefore required.

Reporter's recommendations:

1. Amend bullet point 18 of policy EDQ 1 POLICY Site Appraisal to read:

   - "the potential for a proposed development (particularly business uses) to co-locate and integrate with existing or proposed energy and waste innovations"

2. In the Glossary, amend the definition of 'Historic Environment Assets' to read:

"International, national and local heritage designations to protect world heritage sites, listed buildings and structures, historic gardens and designated landscapes, historic battlefields, conservation areas, scheduled monuments and undesignated archaeology."

3. In PROM 1D2 POLICY delete “in the Guidance”, and in PROM ID2 Categories and Guidance delete “or Guidance”.

4. In PROT B Guidance delete “identified in this Guidance”.

5. In AD 1A Amount of Development Policy Guidance delete “or Guidance”.

6. In AD 1B Amount of Development Policy Guidance delete “or Guidance”.

7. In AD 1C Amount of Development Policy Guidance delete “or Guidance”.

8. In PP 2A Purpose of Place Policy Guidance delete “or Guidance”.

9. In AD 2A Amount of Development Policy Guidance delete “or Guidance”.

10. In PP 2B Purpose of Place Policy Guidance delete “or Guidance”.

11. In AD 2B Amount of Development Policy Guidance delete “or Guidance”.

12. In PP 2C Purpose of Place Policy Guidance delete “or Guidance”.

13. In AD 2C Amount of Development Policy Guidance delete “or Guidance”.

14. In PP 3 Purpose of Place Policy Guidance delete “or Guidance”.

15. In AD 3 Amount of Development Policy Guidance delete “or Guidance”.

16. In PP 4 Purpose of Place Policy Guidance delete “or Guidance”.

17. In AD 4 Amount of Development Policy Guidance delete “or Guidance”.

18. In PP 5 Purpose of Place Policy Guidance delete “or Guidance”.

19. In AD 5 Amount of Development Policy Guidance delete “or Guidance”.

20. Merge together all ‘policy’ and related ‘guidance’ sections to form single, expanded policies in a single box. Delete the heading used for the ‘guidance’ section and retain the policy number and title to refer to all text.

21. On page 12 under the ‘Guidance’ subheading, delete:

“The Plan is supported by guidance accompanying each policy. This provides more detail on how to comply with each Policy and how planning applications will be assessed.”

Replace with:

“The Plan is supported by other statutory and non-statutory guidance, listed in the appendix on pages 135 – 137”. (Note that the page numbers may differ in the final plan).

22. In the title for PROM LOC 1 add the word “POLICY” between the policy number and the words “Regeneration Priorities”.

23. Under ‘Purpose of Guidance’ on page 135 delete the sentence which reads: “Policy guidance has been included in the relevant Guidance section for each Policy, where appropriate.”

24. Amend the table on pages 136 – 137 to remove references to the ‘Guidance’ section of policy, so that it identifies only where separate statutory or non-statutory guidance is intended to be produced (or already exists), and to which policy or policies these documents relate.

25. On page 44, under the ‘Purpose of Place’ subheading add a third paragraph to read:

“In supporting the transition to a low carbon economy, the Plan encourages a positive and flexible approach to integrated placemaking which encourages opportunities for homeworking, live-work units, micro-businesses and community hubs where they meet the assessment of appropriateness.”

26. In section (c) of EDQ 3 POLICY ‘Quality of Development’, add the words “Moving towards a low carbon economy,…” at the start of the sentence.

Issue 002	**Regeneration Priorities**	
Development plan reference:	PROM LOC1 Promoting Development Locations & Infrastructure Regeneration Priorities Page 27	**Reporter:** Christopher Warren
Body or person(s) submitting a representation raising the issue (including reference number):		
Ogilvie Homes (189) Manus O'Donnell (202) Wallace Land Investments (220) Claire McCallum (235) Sandra McCumisky (236) Albert Bartlett & Sons (Airdrie) Ltd (242) Goldcrest Partners LLP (246) Gayle McGuire (250) Amanda McConville (251) Trustees of Miss ID Meiklam (262) Rhiannon Properties Ltd (286) Argyle Ltd (289)		
Provision of the Development Plan to which the issue relates:	PROM LOC1 POLICY Regeneration Priorities North Lanarkshire Council will promote regeneration and sustainable growth through delivering the right amount of development in the right places, developed to the right quality, and for the benefit of the communities they affect. PROM LOC1 Guidance This Policy will be implemented in line with the priorities of the Council's Ambition and Economic Regeneration Delivery Plan. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		
Ogilvie Homes (189), Wallace Land Investments (220), Goldcrest Partners LLP (246), Trustees of Miss ID Meiklam (262) and Rhiannon Properties Ltd (286) object to Policy PROM LOC 1 on the grounds that it fails to provide any degree of clarity to assist potential developers in terms of establishing the broad acceptability of their development proposals. The Policy is a general statement of intent on the part of the Council, a "catch all policy" that provides no meaningful or justifiable basis against which to assess the merits of any given application. Manus O'Donnell (202) objects to Policy PROM LOC 1 on the grounds that it does not include a trigger to allow proposals for alternative uses of land/premises to be considered that would assist and attract investment in regeneration areas and questions the re-provisioning proposals of the programmed demolitions of Council tower blocks mentioned in Economic Regeneration Delivery Plan (AD55). Claire McCallum (235) objects to the development of housing, business or any form of generic regeneration in the Wishaw area, specifically Proposed Housing Development Sites 13/19 & 23/19, Newmains, as shown on Map Book page 12.6.		

Sandra McCumisky (236) objects to the regeneration priorities in terms of location and suitability of land in relation to Proposed Housing Development Site 13/19, Newmains (Map Book page 12.6).

Albert Bartlett & Sons (Airdrie) Ltd (242) objects to the absence of an explanation regarding the non-allocation of a site for a new Monklands Hospital and the non-recognition of Drumshangie as a site that is under consideration as a potential location (SM018).

Gayle McGuire (250) and Amanda McConville (251) object to Existing Housing Development Site NLMW1266 (Map Book 12.6) being built on open space between Bartonhall Road and Burnhall Place, Waterloo.

Argyle Ltd (289) objects to Policy PROM LOC 1.

Modifications sought by those submitting representations:

Ogilvie Homes (189), Wallace Land Investments (220), Goldcrest Partners LLP (246), Trustees of Miss ID Meiklam (262) and Rhiannon Properties Ltd (286) seek the deletion of Policy PROM LOC 1 and its associated “guidance” from the Plan. Argyle Ltd (289) did not specify a modification.

Manus O’Donnell (202) seeks clarification on the proposed demolitions of the tower blocks and how this will affect the Council’s Housing Supply Target, and the inclusion of a new trigger policy in regeneration areas to attract alternative investment through alternative uses, i.e. through housing provision.

Claire McCallum (235) and Sandra McCumisky (236) seek the removal of Proposed Housing Development Sites 13/19 and 23/19 (Map Book 12.6), the retention of their existing Green Belt designation and that no regeneration in any form should be done, unless it is to create a protected woodland. Sandra McCumisky (236) seeks that regeneration is concentrated in Newmains village centre.

Albert Bartlett & Sons (Airdrie) Ltd (242) seeks the following wording included as a Regeneration Priority under Policy PROM LOC 1: “New Monkland Hospital Facility at Drumshangie Moss” and the addition of a new Policy as follows: “PROM LOC 5: ‘New Monklands Hospital’ North Lanarkshire Council will support the delivery of the New Monkland Hospital to the site at ‘Land at Drumshangie Moss’”, with new Guidance to be agreed with Albert Bartlett & Sons (Airdrie) Ltd.

Gayle McGuire (250) and Amanda McConville (251) seek the deletion of Existing Housing Development Site NLMW1266 (Map Book 12.6), between Bartonhall Road and Burnhall Place, Waterloo and its retention as open space, although Amanda McConville (251) did not specify a modification.

Summary of response by planning authority:

Ogilvie Homes (189), Wallace Land Investments (220), Goldcrest Partners LLP (246), Trustees of Miss I D Meiklam (262) Rhiannon Properties Ltd (286) and Argyle Ltd (289) - The Council considers that the purpose of PROM LOC 1 and Guidance is in line with the priorities of the Council’s Ambition (AD51) and Economic Regeneration Delivery Plan (AD55) to promote area-wide regeneration and sustainable development for the benefit of

the communities they affect. The Council believes that it is wholly appropriate to have a statement of intent policy that the Council is committed to regeneration and that this should be stated first and foremost. In fact, the wording of that element of the objection could be considered as a definition of a policy. The Guidance confirms that for different types of development specified in the Policy, a range of more detailed, listed Policies should be considered and that all Policies have to be taken into account. As such, the Council disagrees that PROM LOC 1 and Guidance should be deleted from the Plan.

Manus O'Donnell (202) - The Council, as a partner in the Housing Needs and Demand Assessment (AD68) that is undertaken with other participant authorities of Clydeplan Strategic Development Plan (AD59) that sets the Housing Supply Targets, considers that the proposed demolition of the tower blocks will not affect the Council's Housing Supply Target, as it cannot be assumed simply that the result of this will be a 1:1 unit replacement in the towers to be demolished over the 30-year period of the programme. Through normal estate management, a significant number of units inside the towers are already voided tenancies. At the point of demolition, all of the properties will be empty and the previous households will have formed elsewhere in North Lanarkshire. Known demolitions at the time have been taken into account in the compilation of a Housing Needs & Demand Assessment and Economic Regeneration Delivery Plan/Ambition (AD51 & AD55) will form a key element of the next Housing Need & Demand Assessment for North Lanarkshire/Clydeplan City Region. A broad-based PROM LOC 1 Policy is a statement of intent that promotes regeneration and sustainable development, and is designed to be used in conjunction with other Policies in the Plan that set out more detailed aspects. As such, the Council believes that the Plan has already addressed both elements of the modifications sought.

Claire McCallum (235) and Sandra McCumisky (236) - The Council considers that the purpose of PROM LOC 1 and Guidance promotes area-wide regeneration and sustainable development for the benefit of the communities affected. Proposed Housing Development Sites 13/19 and 23/19 (Map Book 12.6) are supportive of this and is in line with the priorities of the Council's Ambition (AD51) and Economic Regeneration Delivery Plan (AD55). Any planning applications for these sites would be subject to the EDQ policies of the Plan. The EDQ policies require all proposals to demonstrate to the Council's satisfaction that there will be no adverse impact or that impacts can be mitigated in environmental terms. Proposed Housing Development Site 13/19 is in close proximity to central Newmains. The Council therefore disagrees that there should be no regeneration at 13/19 and 23/19.

Albert Bartlett & Sons (Airdrie) Ltd (242) - There was no submission or approach made by NHS Lanarkshire at any of the consultation stages of the Local Development Plan process that intimated that a large site would be required for a new hospital. In the absence of any previous submissions, the ongoing process of identifying a suitable site for the construction of a replacement University Hospital Monklands is outwith the remit and timescale of this Local Development Plan process. The Council disagrees that there is a need to add a policy relating to this issue.

Gayle McGuire (250) and Amanda McConville (251) - Existing Housing Development Site NLMW1266 (Map Book 12.6) lies on an area of ground previously occupied by post-war prefabricated housing, so can be considered non-contributory to the aims of the Green Belt. As such, housing is an appropriate use in principle. Any forthcoming planning application would need to have regard to Policy EDQ1 Site Appraisal, which should ensure that development integrates successfully into the local area and provides linkages

to open space.

Reporter's conclusions:

1. In issue 001 we have recommended a modification to the format of all policies (including PROM LOC1), which requires the separate 'policy' and 'guidance' boxes to be subsumed to form a single, more detailed policy. My conclusions relating to issue 002 are made in this context.

2. Representations object to PROM LOC1 on the basis that it does not provide sufficient clarity to be able to assess the broad acceptability of a proposal. In response, the council has indicated that this is intended to be a statement of intent policy, which refers to and relies upon other policies in the plan.

3. I find no difficulty with the policy (as modified in issue 001) signalling a strategic intention, whilst also relying upon and 'signposting' the wider provisions of the plan, in order for the policy to be applied in practice.

4. Given the policy is reliant upon the plan's wider provisions, its penultimate sentence does seem at odds with its approach. It states that "Any sites proposed outwith the parameters of Policy PROM LOC1 will only be supported if they accord with all Purpose of Place and Amount of Development Policies of this Plan". This introduces some confusion, because the policy 'parameters' are not set by PROM LOC1 itself, but by the other plan provisions it refers to. For this reason, I recommend this sentence be deleted from the policy.

5. In a similar vein, I find that the policy's reliance on the plan more widely should be made clearer in its first sentence. This would ensure that the policy is interpreted as intended by the council, as a statement of intent which will be achieved through compliance with the plan's provisions taken in the round. Subject to this further modification, I am satisfied that the policy would provide sufficient clarity on both its intent and how it is to be applied in practice, and I find no need to delete the policy as requested in representations.

6. A representation refers to the implications of proposed tower block demolitions upon the housing supply target. I have reached conclusions on this matter in issue 4. The representation also suggests providing a new 'trigger policy', to allow proposals for alternative uses to be considered in regeneration areas, in order to attract investment. No precise policy wording has been suggested but, in any event, I do not find the scope of policy PROM LOC1 to be inappropriate or insufficient. The development potential, opportunities and constraints in specific area is provided with reference to the wide-ranging plan provisions that are signposted by this policy. Any 'trigger' for considering alternative types of a site's development to that promoted by the plan would be guided by the plan as a whole, but framed by the overarching statement of intent for regeneration set out in policy PROM LOC1. No modification is required.

7. Representations have been made which object to policy PROM LOC1, but the substance of the objections do not relate to this policy but to the proposed allocation of sites 13/19 and 23/19 at Newmains, site NLMW1266 at Waterloo. These representations are addressed in issue 4, and I have not sought to repeat those findings here.

8. Representation 242 asserts that policy PROM LOC1 should identify land at

Drumshangie Moss as a regeneration priority for a new Monkland Hospital. It also suggests a new dedicated policy should be added to the plan, to support delivery of a hospital on the site.

9. In response to a further information request to establish whether a new hospital site was required to be identified, the council has confirmed that in late January 2021, the Scottish Government Cabinet Secretary for Health agreed to the identification by NHS Lanarkshire of land at Wester Moffat Farm, Airdrie, as its preferred location for a replacement University Hospital Monklands. Consequently, NHS Lanarkshire is not pursuing Drumshangie Moss/East of A73 as a potential site for a replacement University Hospital Monklands. There would be no basis to allocate or identify land at Drumshangie Moss as a new hospital site given this recent announcement, and no modification is required.

Reporter's recommendations:

1. In PROM LOC1 Regeneration Priorities delete the sentence which reads "Any sites proposed outwith the parameters of Policy PROM LOC1 will only be supported if they accord with all Purpose of Place and Amount of Development Policies of this Plan".

2. Amend the first sentence of PROM LOC1 Regeneration Priorities to read:

"North Lanarkshire Council will promote regeneration and sustainable growth, by applying the policies in this plan to deliver the right amount of development in the right places, developed to the right quality, and for the benefit of the communities they affect."

Issue 003	**Business Development Sites**	
Development plan reference:	PROM LOC2 Business Development Sites Page 28	**Reporter:** Sue Bell
Body or person(s) submitting a representation raising the issue (including reference number):		
Newhouse Investments Ltd (187) Manus O'Donnell (202) Arrandale Ltd (204) William Dow (223) WH Sawyers (224) Sandra McCumisky (236) Woodblane Developments Ltd (240) Ediston Properties Ltd (248) Amanda McConville (251) Strockweld (257) Trustees of the Douglas Support Estate (260) Sir Frank Mears Associates (261) Argyle (289)		
Provision of the Development Plan to which the issue relates:	PROM LOC2 POLICY Business Development Sites North Lanarkshire Council will support and direct business development to the Strategic and Local Business Centres identified in the Plan and Industrial and Business Land Supply. North Lanarkshire Council will support the development of the Visitor Economy and manage the type and scale of development through Policies AD 2C and PP 2C. PROM LOC2 Guidance Purposes of Place Policies PP 2A, PP 2B and PP2C indicate the uses deemed appropriate for each of these types of locations, with Amount of Development Policies AD 2A, AD 2B, and AD 2C indicating the relevant scales of development and how development proposals will be considered by the Council. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		
Newhouse Investments Ltd (187) and supporting documents RD256-257, objects on the grounds that Land South of Edinburgh Road, Newhouse (SM026), should be removed from the Green Belt and re-designated as a Proposed Business Development Site. Manus O'Donnell (202) objects to Policy PROM LOC 2 on the grounds that only proven effective and marketable sites should continue to be included in the most recent Industrial and Business Land Survey. Arrandale Ltd (204) and supporting documents RD052-063 and RD252-255, objects on the grounds that the Site South of New Edinburgh Road, Newhouse (SM001) be removed from the Green Belt and allocated for a mix of uses comprising employment, other commercial uses and residential.		

William Dow (223), Amanda McConville (251) and Argyle (289) object to Policy PROM LOC 2.

Sandra McCumisky (230) objects to any business development at Proposed Housing Development Site 13/19 (Map Book 12.6) given its close proximity to existing housing and small businesses.

WH Sawyers (224) and supporting documents RD147-151, objects on the grounds that Site A and Site B north of M8 Junction 6 (SM023), CfS/MIR Site 0006/11, should be removed from the Green Belt and allocated as a Mixed-Use Centre, or as a Proposed Business Site, Proposed Leisure Site and a Proposed Retail Site.

Woodblane Developments Ltd (240) and supporting document RD201, objects on the grounds that CfS/MIR Site 0019/12 Eastfield Strip, Edinburgh Road, Harthill (SM024), should be allocated as a Proposed Business Development Site.

Ediston Properties Ltd (248) and supporting document RD212, objects to the existing B&Q at Caldeen Road, Coatbridge, changing from Commercial Centre to Business Centre. There is no opportunity now or in the future for this site to become available for any business or industrial use.

Strockweld (257) and supporting documents RD216-217, objects on the grounds that a site at 607 Main Street, Mossend (SM025), and its premises at Marion Street, Mossend, should be removed from PROM LOC 2 and re-designated under Policy PROM LOC 3.

Trustees of the Douglas Support Estate (260) objects on the grounds that land between the A8 and M8, south of Coatbridge, Midshawhead (SM002), should be removed from the Green Belt and re-designated for a mix of business uses, as it is seriously compromised due to trunk roads on either side.

Sir Frank Mears Associates (261) objects on the grounds that some 21 Ha of land East of Biggar Road, Cleland (SM003), to the A73 should be removed from the Green Belt and re-designated for business and industry.

Modifications sought by those submitting representations:

Newhouse Investments Ltd (187) seeks the allocation of land at Newhouse as a Proposed Business Development Site.

Manus O'Donnell (202) seeks deletion of "Potentially Marketable" from PROM LOC 2 and the inclusion of a new trigger policy for Business Development Sites to enable alternative uses, i.e., housing development, for sites considered "potentially marketable" and those with no demonstrable market interest.

Arrandale Ltd (204) seeks the allocation of land at Newhouse for a mix of uses comprising employment, other commercial users and residential.

William Dow (223), Amanda McConville (251) and Argyle (289) no modification submitted.

WH Sawyers (224) seeks that Site A and Site B (SM023) should be allocated as a Mixed-Use Centre, or Proposed Business Development Site, Proposed Leisure Development

Site and a Proposed Retail Site.

Sandra McCumisky (236) no modification submitted.

Woodblane Developments Ltd (240) seeks the allocation of Eastfield Strip, Edinburgh Road, Harthill (SM024) as a Proposed Business Development Site.

Ediston Properties Ltd (248) seeks the removal of land at B&Q, Caldeen Road, Coatbridge, from its Business Centre designation.

Strockweld (257) seeks that a site at 607 Main Street, Mossend (SM025), and its premises at Marion Street, Mossend, should be removed from PROM LOC 2, be re-designated under Policy PROM LOC 3 and Proposals map 10.4 be amended accordingly

Trustees of the Douglas Support Estate (260) seeks the allocation of land between the A8 and M8, South of Coatbridge (SM002) as a Strategic Business Centre.

Sir Frank Mears Associates (261) seeks the expansion of Cleland (SM003) eastwards to the A73 boundary east of Cleland to include the whole site put forward, to allow for future master planning.

Summary of response by planning authority:

Newhouse Investments Ltd (187), Arrandale Ltd (204), William Dow (223), WH Sawyers (224), Sandra McCumisky (236), Woodblane Developments Ltd (240), Amanda McConville (251), Trustees of the Douglas Support Estate (260), Sir Frank Mears Associates (261) and Argyle (289) - It was noted by the Scottish Ministers in the examination of the North Lanarkshire Local Plan 2012, that North Lanarkshire had a generous supply of land for business and industry. Due to the changing nature of the economy, a reassessment of the future viability of business and industry sites was under taken by the Council in early 2014, using the Places for Business and Industry Charrette (AD30) as part of the preparation for the Local Development Plan.

The Council considers that Policy PROM LOC 2 reflects the outcome of the Places for Business and Industry Charrette (AD30) that was undertaken to develop a policy framework reflective of that changing nature of the economy, marketable/potentially marketable land for Industry and Business and new sites identified as preferred proposed business sites in the Main Issues Report 2016 (AD22). As such, the Council believes that there is no need for any new additions to the industrial and business supply. The outcome of this process was an alternative Planning Policy Framework for business and industry, with the identification of a number of Strategic and Local Business Centres. A number of areas were identified that had not fulfilled their full economic potential, and are in included in the Plan as potential areas of change where the main business and industry zoning could be combined with other land uses. This will assist these areas to meet their full potential and benefit the local communities.

Part of the land on which Sir Frank Mears Associates (261) seeks the eastern expansion of Cleland to the A73 comprises CfS Site 0025/19. It should be noted that the following, as shown in AD72, expressed support for the Council's non-allocation of CfS Site 0025/19 for housing, so are not listed at the beginning of this Schedule 4: Andrea Fraser (154), Michelle Smith (155), Paul Smith (156), John Percy (157), Alison Irvine (158), Frank McBride (159), James Dooey (160), Michelle Rae (161), Gavin Rae (162), Adam

Rae (163), John Rae (164), John Alcorn (165), Janice Arnott (166), Robert Bell (167), Ellen Bell (168), Deborah Finnie (169), Stacy Banks (170), David Young (171), Margaret McSpadyen (172), Catherine McBride (173), Una Alcorn (174), Robert Alcorn (175), Simon Kirkwood (176), Derek Fearon (177), Alex Young (180), Mrs Mary McFarlane (181), Rebecca Fearon (182), Anna T Kane (183), Gerard B McFarlane (184), Miriam Purves (185), Julia Fearon (186), Louise Roarty (187), Christopher Roarty (188), Benny Smith (189), Stephen Roarty (190), Laura Feighan (191), Robert Arnott (192), Pamela McShane (193), Douglas Wilson (194), Leanne Wilson (195), Margo Young (196) and Patrick Ferguson (197)

Manus O'Donnell (202) - The Council considers that the Marketable and Potentially Marketable sites identified in the 2017 Industrial and Business Land Survey (AD56), used to inform Policy PROM LOC 2, adheres to the agreed definitions by all constituent authorities that make up the Clydeplan Strategic Development Plan (AD59) area. The eight authorities work to previously agreed definitions of marketable and potentially marketable supply, to ensure that there is a 10-year industry and business supply across the Clydeplan area. Policy PROM LOC 2 reflects the outcome of the Places for Business and Industry Charrette (AD30) that informed a new planning policy framework, which is receptive to the changing nature of the economy, and is designed to be used in conjunction with other policies in the Plan that set out more detailed aspects. As such, the Council believes that the Plan has already addressed both elements of the modifications sought.

Ediston Properties Ltd (248) - The Council no longer recognises isolated, large, single-user retail stores as constituting any form of commercial centre. This is not an impediment to continued retail use at these locations. Whilst the site does offer retail, the Council does not consider that it fits any of the categories identified within the Mixed-Use Centres network. The Council does not accept that further changes are needed in respect of this Policy.

Strockweld (257) - Should the Reporter find it acceptable, the Council proposes an extension of the adjacent Land Use Character Area General Urban Area to cover this site, as the uses adjacent to this site are a mixture of residential and commercial uses.

Reporter's conclusions:

1. A number of the representations identify areas of land, which they consider should be identified as additional business development sites. I firstly consider the need to identify additional land for business purposes and the scope of the policy, before considering the merits of the individual proposed sites.

<u>Proposals for additional land to be allocated as Business Development Sites</u>

2. Scottish Planning Policy (paragraph 101) sets out 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."

3. Paragraph 102 of the same document expects business land audits to be undertaken regularly by local authorities to inform reviews of development plans and paragraph 103

notes that "Where existing business sites are underused, for example where there has been an increase in vacancy rates, 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."

4. The examination of the current adopted North Lanarkshire Local Plan 2012 concluded that North Lanarkshire had a generous supply of business land, stated to be sufficient to meet around 150 years of projected demand.

5. To inform the preparation of the modified proposed plan, the council undertook a business and industry charrette. Its purpose was to address concerns of a potential oversupply of business and industrial land in North Lanarkshire and develop an alternative planning policy approach for business and industry in the council area. The charette considered the national level of demand and market conditions, and the availability of business and industrial land supply in North Lanarkshire. It confirmed that there was plenty of land available for business and industrial use, particularly in terms of the office market, but noted that the right type of product is not always in the right type of place. It considered barriers to uptake of land and measures required to ensure that sites were available for development.

6. In addition, the 2017 Industrial and Business Land Survey provides an update of the marketable and potentially marketable sites.

7. Together, the charrette and survey have informed the wording of policy PROM LOC2. The proposed policy sets out a spatial network of different types of business and industrial locations. It also includes for general placemaking principles for all business and industrial locations. I note that this approach was included within the main issues report in 2016, and that over 90% of respondents agreed with the preferred option (as set out in the main issues report on responses and site options consultation (AD22)).

8. I am therefore content that there has been a recent assessment of the need for and supply of business land and that this has informed the identification of suitable sites within the modified proposed plan. I am also satisfied that there is a generous supply of land for business use and hence there is no need to identify additional sites at examination. Hence, no modification is required.

Scope of Policy

9. The representation from Manus O'Donnell (202) appears to seek a narrower definition of business sites to include only those assessed as marketable, rather than potentially marketable. It is also seeking changes to the policy to include provision for potentially marketable business sites, or those where there is no demonstrable market interest, to be reallocated for other purposes such as housing.

10. As noted above, Scottish Planning Policy identifies market demand as one of the aspects that should be taken into account when identifying sites for business use.

11. In addition, I note that the constituent authorities that make up the Clydeplan strategic development plan area work to previously agreed definitions of marketable and potentially marketable supply.

12. Supporting policies in the plan (PP 2A, PP 2B, PP 2C, AD 2A, AD 2B, AD 2C)

include criteria for determining what other types of proposal might be acceptable within different classes of business development sites, providing flexibility for accommodating alternative uses on sites where appropriate.

13. As I concluded above, the proposed approach including the availability and suitability of business land has been subject to a recent, robust assessment, which has used agreed criteria for marketability. Therefore, no modification is required.

14. I note that there have been several objections to the policy, which are not accompanied by any supporting comments. Scottish Planning Policy (paragraph 93) requires the planning system to allocate sites that meet the diverse needs of the different sectors and sizes of business. As set out above, I have concluded that the council has met this requirement. Therefore, no modification is required.

Land south of Edinburgh Road, Newhouse (SM026) and site south of New Edinburgh Road, Newhouse (SM001)

15. All representations in relation to these sites are addressed as part of issue 17.

Woodhall Road, Newmains 13/19

16. The representation objects to any business development at this site. However, the site is allocated for housing, rather than business use. Further comments about the suitability of this site for housing are addressed as part of Issue 4.

Sites A and B north of M8 Junction 6 (SM023)

17. This representation is also recorded in issue 17. My conclusions here take into account the whole of the representation.

18. The representation seeks the removal of two parcels of land from the green belt and their re-allocation as a mixed use centre or proposed business site, proposed leisure site and a proposed retail site.

19. Whilst these sites are both situated north of and close to the M8 and are under the same ownership, there is no obvious connection between them. They are separated by the A73 Bellside Road dual carriageway and are accessed via different roads. Land lying to the north-west is referred to by the representor as ‘site A’, whilst the land to the north-east is referred to as ‘site B’.

20. Both sites are shown on the LDP promote map 10.5 as lying within the green belt. However, site A forms the southern-most part of a larger site marked as a specialised business site NLC00532.

21. During this examination I sought clarification about the dual allocation of site A; the planning history of each site and how this should influence their allocation within the modified proposed plan; and whether both sites should be treated in the same way for allocation within the modified proposed plan. The representor was also given an opportunity to respond on these issues.

22. The council has explained that site A forms part of a larger area that is identified as a specialised business site and industrial & business land site (NL00532) under policy

PROM LOC2 within the modified proposed plan. However, until a suitable high-quality use can be brought forward, the site is considered to be green belt.

23. The area to the north and east of site A benefits from planning permission in principle (reference 18/00266/PPP) for a "mixed use development comprising class 3 (food & drink), class 7 (hotel), class 11 (assembly/leisure), class 1 (ancillary retail) and sui generis (roadside fuel/electric charging, hot food takeaway, public bar) with associated infrastructure (drainage, ground treatment landscaping)".

24. In addition, both site A and site B have been the subject of a Certificate of Appropriate Alternative Development (CAAD). In response to my further information request, the council confirmed that the CAAD it had issued was appealed by Transport Scotland. The appeal was upheld by Scottish Ministers and a new CAAD was issued. The replacement CAAD lists a more restricted range of use classes than the original CAAD. For site A these are: class 7, but only as an hotel; class 10, but only as an education/tourist facility relating to rural or natural heritage interests; and class 11, but only as an equestrian facility, or as a golf course/golf driving range. At cite B, the CAAD lists development within class 11, but only for use as an equestrian facility.

25. The council has explained that the dual allocation of the area to the west of Bellside Road follows the recommendations set out in the report of examination of the current adopted local plan. It notes that as no acceptable proposals had come forward by the time of preparation of the modified proposed plan, it was decided to maintain the policy position. The council's approach is that reporters' recommended modifications to the local plan are to be given two full plan cycles to come to fruition before review. Thus, the council proposes to maintain the dual designation of green belt and specialised business site within the modified proposed plan. It considers that maintaining the site within the green belt within the modified proposed plan would ensure that if the site is not developed for high-quality business use, it is protected from inappropriate urban-type development.

26. The previous examination of the adopted local plan identified a generous supply of land for business and industry. Consequently, the reporter recommended (AD54 pages 34-36) that land immediately to the west of Old Biggar Road, which was identified for allocation for industrial and business development (known as Dunalaster East) should no longer be allocated for those purposes, but be reallocated as green belt. However, he further recommended that "a site of unspecified size at the roundabout junction of the A73, south of Lancaster Avenue and west of Bellside Road" should be reserved "for a high value, high amenity business use". The recommendation continued that any proposals "would need to demonstrate to the satisfaction of the planning authority, that they meet the above criteria and are of a type, scale and form that is compatible with the remainder of the land south of Lancaster Avenue remaining as green belt land."

27. It seems to me that the reporter's main objective, in removing land from business use and reallocating it as green belt was to create a buffer between the M8 and residential development at Chapelhall. In addition, the proposal for specialised business development applied to a relatively small development adjacent to the roundabout junction on the A73 immediately to the west of Bellside Road and did not extend to the much larger area now identified within the modified proposed plan. Indeed, the reporter expressly stated that he considered that a larger site promoted at that time to be excessive and not justified. He also highlighted that "such a large site allocation would not be in keeping with the overall philosophy of the green belt as it would become the dominant characteristic feature of this cordon area between the built up area of

Chapelhall and the M8 corridor."

28. Further, the recommendation from the reporter, quoted in the council's response to my further information request, clearly states that any proposals for the site at the roundabout should be "of a type, scale and form that is compatible with the remainder of the land south of Lancaster Avenue remaining as green belt land."

29. Since that time the council has granted planning permission in principle for land in the north-east of the site. Nevertheless, given the clear indication of the importance of the green belt in acting as a buffer between Chapelhall and the motorway, I find it difficult to understand the council's logic for expanding the size of the strategic business area beyond the land subject to planning permission in principle.

30. The council has indicated that site A has only been included within the boundary of the specialised business site as a consequence of boundary definition. I do not accept the council's position that the only logical southern boundary is the M8 Junction 6/6A A8 Eastbound off-slip. During my site inspection I saw that there are clear field boundaries lying to the south of the roundabout, which could have been used in preference to the off-slip and which would have taken account of the planning permission in principle, whilst maintaining continuity of the green belt.

31. I accept that the land does not have any particularly notable aesthetic features; it appears agricultural in character and there are areas of scrub and woodland. Nevertheless, during my site inspection I saw that it does fulfil an important function in creating separation between the residential development to the north of Lancaster Avenue and the A8/ M8.

32. Development of the whole area south of Lancaster Avenue that lies between Biggar Road to the west and the A73 (Bellside Road) to the east, would act to remove the green belt buffer between the M8 and Chapelhall at this location. It would also act to sever the green belt areas to the west and east of the site. Given the role that this area plays in linking areas of green belt, I find that it is appropriate to maintain its designation for that purpose.

33. Nevertheless, the site is in a highly accessible location and has also been identified as suitable for high-quality business use. Thus, the principle of the site's development has been assessed as acceptable under the right circumstances. I accept the council's position that retaining the green belt designation would help to ensure that in the absence of a high-quality business use, the site is protected from urban-type development and it would only be released for high-quality business use.

34. Notwithstanding my comments above, although site A lies outwith the area that benefits from planning permission in principle, it clearly lies within the boundary of the wider area that has been allocated as a specialised business site within the modified proposed plan and shown on LDP promote map 10.5. The allocation of this area for specialised business use is further stated within the Airdrie local area partnership area strategy, on page 96 of the modified proposed plan. Thus, I conclude that all areas within the boundary are subject to the same policy provisions as set out in policy PROM LOC2.

35. I note the representor's view that the planning permission in principle includes a number of uses which are not normally accepted within the green belt or for a specialised

business area and that this would be a significant material consideration for any planning application for the remaining land within the identified specialised business site.

36. Whether or not that is the case, any application for development at site A (or elsewhere within the specialised business site) would need to be considered on its merits. My task is to consider whether the proposed dual allocation of the site as a specialised business site within the green belt is appropriate. As I have already indicated, I accept that the site should be retained within the green belt and should only be released to enable high-quality business uses, which meet the required policy tests.

37. Whilst site A benefits from a CAAD, I am persuaded by the council that the purpose of a CAAD is purely to determine the levels of compensation due in the event of a compulsory purchase order being served by a public authority in accordance with circular 6/2011 'Compulsory Purchase Orders'. The council does not consider it to be a proxy for planning permission or a local development plan allocation. I note that in its additional response, the representor does not dispute the council's view of the role of a CAAD.

38. In any case, for the reasons set out above, I have concluded that site A would be subject to the same policy provisions as the rest of the specialised business site.

39. In conclusion, I find the dual allocation of the area including site A as both a specialised business site and green belt to be appropriate.

40. Turning now to site B, this is clearly separate from both site A and the specialised business site. During my site inspection I saw that if forms part of a wider mainly agricultural landscape to the north and east, which forms the green belt to the east of Chapelhall. Despite the proximity of the M8 it has a more rural feel. Site B is not subject to any extant planning approvals. I note that the CAAD, which was awarded following appeal, identified the area as suitable for a very limited range of development, compatible with a rural location within the green belt. I am not persuaded that there is any justification for removing the site from the green belt and reallocating it for an alternative use. Hence, no modification is required.

<u>Eastfield Strip, Edinburgh Road, Harthill (SM024)</u>

41. My assessment below also takes account of representations raised about this site under issue 8.

42. The representation seeks the allocation of the site for business use and removal of the designation of the land as a Site of Importance for Nature Conservation (SINC). It states that the site has previously been allocated for business use and benefited from planning permission for use as a business park/offices/light industrial use, which has now expired. It also considers that any nature conservation value will have declined owing to a lack of management.

43. During my site inspection, I saw that the site lies adjacent to the M8 and slopes towards it. It is situated on the edge of Eastfield and is currently an area of largely unmanaged green space with trees and scrub. Whilst I note the representor's comments about the likely condition and value of the SINC, I have not been provided with any evidence to substantiate this.

44. Part of the site is faced by residential accommodation, so the site acts to extend the undeveloped area into the settlement and act as a buffer between the housing and the motorway.

45. I saw that land to the east of the site is used for a petrol station and business use. Thus allocation of this site for business use would act to extend business development along the north side of Eastfield Road.

46. Nevertheless, I note that there is a generous supply of business land within North Lanarkshire. As noted above, the site acts to create separation between residential properties and the motorway. Therefore, I see no basis for modifying the plan to include this site.

Land between the A8 and M8 south of Coatbridge, Midshawhead (SM002)

47. My assessment below also considers representations recorded under issue 27.

48. The representation seeks the removal of the site from the green belt and allocation as a strategic business centre or for housing.

49. As noted above, the supply of land and choice of sites for business use has been reviewed through the business and industry charrette, which was conducted to inform the modified proposed plan. I note that this site was not included within that assessment and the reasons for this. Nevertheless, that process has identified a generous supply of land for business use and hence there is no imperative to identify additional sites or release this site from the green belt to meet a shortfall.

50. Likewise, the adequacy of the housing supply has been considered as part of issue 4, which has shown that there is adequate provision of housing land identified within the Motherwell housing sub-market area, in which this site is located. There is no imperative to allocate additional housing land in this area. Despite this, it is relevant to note that I saw that the site is surrounded by trunk roads, which could compromise its suitability for housing. I have not been provided with any environmental information or evidence of public engagement that would demonstrate the suitability of the site for this purpose.

51. I therefore conclude that no modification is required.

Land to East of Biggar Road, Cleland (SM003)

52. Representations in respect of this site are addressed under issue 16.

Ediston Properties Ltd (248)

53. Matters raised in representation 248 are addressed in issue 12, where it is recommended that the B&Q site be designated as a commercial centre.

607 Main Street, Mossend (SM025) and Marion Street, Mossend

54. The site has two parts; a vacant pub and car park which fronts a main road and a sheet metal working yard to the rear of the pub. I note that the metal working yard lies at the southern extremity of a strategic business centre, but that the pub and car park sits

within the urban area.

55. During my site inspection, I saw that the surrounding area is mixed in character. To the immediate east is an access road and a large business unit, and there is housing to the immediate west of the site. Further housing is present on the road facing the pub and car park. This mixed character is reflective of the site's location, at the southern extremity of the Eurocentral-Mossend-Newhouse strategic business centre shown on the LDP promote map 10.4. The land to the immediate south and west of the site is shown as within the general urban area.

56. The site is very small in area, when compared to the identified business centre as a whole. The 'Places for business and industry charrette background report' prepared for the council refers to an oversupply of business/industrial land within North Lanarkshire. Against this background of a generous supply of business land and the site's location on the very edge of the strategic business centre, I accept that the removal of this site from the business allocation would not have an adverse effect on the supply of business land and hence the adequacy of the modified proposed plan.

57. Notwithstanding my comments above, I am not persuaded that the land should be allocated for housing. The supply of land for housing is addressed as part of Issue 04 of this examination. That has concluded that there is an adequate supply of housing land within North Lanarkshire as a whole and within the Motherwell housing sub-market area. Therefore, I see no justification for the allocation of this site for housing. Instead, I recommend that it be re-allocated as part of the general urban area. This provides flexibility in future use over the plan period.

Reporter's recommendations:

1. On LDP Promote Map 10.4, remove the site 'land at 607 Main Street, Mossend' (SM025) from the Strategic Business Centre and include it within the General Urban Area.

Issue 004	**Housing Development Sites**	
Development plan reference:	PROM LOC3 Housing Development Sites Page 29	**Reporter:** Christopher Warren

Body or person(s) submitting a representation raising the issue (including reference number):

Margaret Lang (001)	Lynne MacDonald (125)
Samantha Lang (002)	Alan Cameron (126)
Marina Dolan (003)	Lyanne Cameron (127)
Josephine Steel (004)	Margaret McCaul (128)
Martin Pickering (005)	Maryann Milne (129)
Catrina Pickering (006)	John McAllister (130)
Alison (007)	Mairi McAllister (131)
Lesley McCormick (008)	Scott McIlvaney (132)
Paul McCormick (009)	Corrina Summers (133)
Scott McGill (010)	Ian Summers (134)
Rebecca Weir (011)	Logan Summers (135)
Michelle McGill (012)	Eileen McIlvaney (136)
Scott Mitchell (013)	Kirsty Forrest (137)
Diane Mitchell (014)	Patricia Clark (138)
Ian Thomson (015)	Rachel Smith (139)
Caroline Thomson (016)	Stephen Dickson (140)
Lynsey Houston (017)	Daniel Smith (141)
Neil Houston (018)	Morven Thomson (142)
Richard Forrest (019)	William McCaul (143)
Stephen Miller (020)	Lisa Neilson (144)
Emma Louise Miller (021)	Gary Neilson (145)
Mark Brownlie (022)	Oliver Lang (146)
Nicola Brownlie (023)	Joseph Currie (147)
Ryan Fulton (024)	Marianne Currie (148)
Lydia Ellis (025)	Scott Podmore (149)
Nick Johnstone (026)	Lynn Podmore (150)
Jillian Johnstone (027)	Sharon Campbell (151)
Catherine McKay (028)	Fiona Murdoch (152)
Tony Paterson (029)	Alistair McDonald (154)
Marion Paterson (030)	Ann MacDonald (155)
Amy Hunter (031)	Cheryl Scott (156)
Mark Fleming (032)	Alex Coles (157)
Anne Barr (033)	Laura McReady (158)
Melissa Lees (034)	Ian Hamilton (159)
Graeme Lees (035)	Paul McAtamney (160)
Christopher Stone (036)	James Dickie (161)
Tracey Stone (037)	Geraldine Ward (162)
Cheryl Mooney (038)	Lawrence Ward (163)
Siobhan Mooney (039)	George Burns (164)
Colin Nicol (040)	Michael Burns (165)
Terry Bissessar (041)	Moira Burns (166)
Hazel Bissessar (042)	Graeme & Susan Brough (167)
Mary O'Brien (043)	Lisa Bradley (168)
John O'Brien (044)	Jamie Bradley (169)

Angela Nicol (045)	Taylor Grange Developments (170)
Marilyn MacFarlane (046)	Cathy Holmes (171)
David Gray (047)	Iain MacDonald (172)
David Lang (048)	Gartcosh Tenants & Residents Association (179)
Craig McGowan (049)	Ogilvie Homes (188)
Ailie McGowan (050)	Ogilvie Homes (189)
Linsey Bryson (051)	Ogilvie Homes (190)
Allan Leach (052)	Delta Westerwood Property Ltd (191)
Anne McGowan (053)	Walker Group (Scotland) Ltd (192)
Allyson Lachlan (054)	Lisa Dolson (193)
Rachel Pettigrew (055)	Bryce Baxter (194)
Shannon Frane (056)	Elizabeth Baxter (195)
Stephen Jackson (057)	Sam Orr (196)
Vicky McLean (058)	Hugh Weir (197)
Tony Cannavan (059)	Ben Dolson (198)
Sean Kelly (060)	Helen Barr (199)
Mark Paterson (061)	Neil John Diamond (200)
Mark Griffin (062)	Jim Halliday (201)
Lynsey McDaid (063)	Manus O'Donnell (202)
Lynsey Jackson (064)	Patricia Dixon (203)
Lynette Cleland (065)	Arrandale Ltd (204)
Louise Charlton (066)	Aggregate Industries UK Ltd (207)
Karen Griffin (067)	Hallam Land Management (208)
Joanne Keenan (068)	Hallam Land Management (209)
John Lee Thomas (069)	Ronnie & Alan Bartlett (210)
John Keenan (070)	WB Properties Ltd (212)
Jonathan Geddes (071)	WB Properties Ltd (213)
Ian Moon (072)	Chepstow (Holdings) Ltd (214)
Graeme Pettigrew (073)	Stewart Milne Homes (216)
Flora Kelly (074)	Taylor Wimpey Strategic Land (218)
Fiona Geddes (075)	Wallace Land Investments (219)
Donna Moon (076)	Wallace Land Investments (220)
David McDaid (077)	Taylor Wimpey (225)
Brian Macys (078)	Upland Developments Limited (226)
Ann Macys (079)	J & P Hannaway (227)
Graham Hall (080)	Beechwood Investments (228)
Clare Hall (081)	Ian Telford (229)
Laura Weston (082)	Maritsan Developments Ltd (230)
James Weston (083)	Barratt Homes West Scotland (231)
Caroline Mooney (084)	George Dougal (233)
Jim Mooney (085)	Kapital Residential Ltd (234)
Margaret Mooney (086)	Claire McCallum (235)
Mary Ann Frame (087)	Sandra McCumisky (236)
Shannon Frame (088)	Airdrie Golf Club (237)
Tracey Mcculloch (089)	Robertson Homes (238)
Drew Mcculloch (090)	T Gorman Haulage Ltd (239)
Heather Richardson (091)	Albert Bartlett & Sons (Airdrie) Ltd (242)
Lynda Chang (092)	Cala Homes (West) Ltd (245)
Barry McMillan (093)	Goldcrest Partners LLP (246)
Susanne McMillan (094)	Springfield Properties PLC (247)
John McLaughlin (095)	Sharon Jones (249)
Francis McLaughlin (096)	

Bridget Mathieson McLaughlin (097) Billy Paterson (098) Joanna Docherty (099) Mark Thomson (100) Emma Thomson (101) Julieann Kerrigan (102) Kathleen Brunton (103) Louise Sutherland (104) Craig Hunter (105) Zac Hunter (106) Gillian Hunter (107) Audrey Duffy (108) James Duffy (109) Sarah Duffy (110) Lyndsey Harrold (111) Stephen Harrold (112) Alistair Grant (113) Marion Cuthbertson (114) Jack Murdoch (115) Pauline Graham (116) Allan Wilson (117) Councillor Clare Quigley (118) John Harper (119) Robert McKendrick (120) Newmains & District Community Council (121) Anne Harper (122) Martyn Forrest (123) Martyn Forrest (124)	Amanda McConville (251) Emma Blyth (252) Ian MacFarlane (253) Central Scotland Green Network Trust (254) Strockweld (257) Miller Homes (258) Miller Homes (259) Trustees of the Douglas Support Estate (260) Sir Frank Mears Associates (261) Barratt Homes West Scotland & CALA Homes (West) Ltd (264) Maria McShannon (265) Homes for Scotland (266) Wilson Developments (Scotland) Ltd (269) Cumbernauld Village Community Council (270) Daniel Smith (271) Auchinloch Community Council and Northern Corridor Community Forum (277) Orchard Brae Ltd (278) Alice & Francis Morton (280) Colin Nicholson (282) MN & JJ Robbins Suffolk Life SIPP (284) Joeswood Estates Ltd (285) Rhiannon Properties Ltd (286) Monklands Glen Community Council (287) Argyle (289)
Provision of the Development Plan to which the issue relates:	PROM LOC3 POLICY Housing Development Sites All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

Planning authority's summary of the representation(s):

Authority's Summary of Objections to Housing Land Supply/PROM LOC 3 Wording

Ogilvie Homes (188.237) (188.238) (189) (190) and supporting documents RD18-45. Delta Westerwood Property Ltd (191) and supporting documents RD46-51, Arrandale Ltd (204) and supporting documents RD52-63, and Hallam Land Management (208) and supporting documents RD69-79, and Orchard Brae Ltd (278) object to the Council's Housing Land Strategy on the grounds that there is a shortfall in effective housing land supply and additional allocations are required to meet housing demand.

Manus O'Donnell (202), Wallace Land Investments (219) and supporting documents RD128-135, and Wallace Land Investments (220) and supporting documents RD136-143, Barratt Homes West Scotland (231.294) and supporting documents RD180-186, and Barratt Homes West Scotland (231.305) and supporting documents RD187-195, Hallam Land Management (209) and supporting documents RD080-081, Barrett Homes West Scotland & CALA Homes (West) Ltd (264) and supporting documents RD228-234, Homes for Scotland (266) and supporting documents RD235-237, object to Policy PROM LOC 3 on the grounds the first part of the Policy lacks clarity and the second part seeks to

introduce a sequential approach inconsistent with Clydeplan and Scottish Planning Policy.

Cala Homes (West) Ltd (245) and supporting document RD209, Miller Homes (258) and supporting documents RD218-220 and Miller Homes (259) and supporting documents RD221-226, and Rhiannon Properties Ltd (286) Object to Policy PROM LOC 3 on grounds that the hierarchy does not reflect the reality that planning applications are not submitted in an orderly way that will allow a sequential test to be applied; non-effective sites cannot be used to bolster the effective housing land supply; the Housing Land Requirement methodology, including Tables 1-6 on pages 140/141 of the Plan, does not accord with Clydeplan Strategic Development Plan (AD59), Scottish Planning Policy (SPP) (AD60) or PAN 2/2010 (AD64). Miller Homes (258) cites Clydeplan (AD59) Policy 8 and paragraph 118 specifically and refers to a recent Opinion of the Court of Session, its outcome and the impact of a shortfall in housing supply upon decision making, whilst Homes for Scotland (266) and supporting documents RD235-237, contends that no Action Programme has been prepared and as such there is a lack of evidence of any programming of the housing land supply available for scrutiny; the housing land supply should be extrapolated to 2028/29 to determine whether or not the housing land requirements are met in full; the effective land supply does not account for the 1,700 planning demolitions by 2024 as set out in the Council's Ambition Programme Phase 1 and the evidenced shortfall in the accompanying 'Housing Land Supply Statement' document. Arrandale Ltd (204) and supporting documents RD052-063/RD252-255, and Beechwood Investments (228.288) and supporting document RD176, also cite this as a grounds for objection, whilst Hallam Land Management (208) and supporting documents RD69-79, adds that the land supply may be further exacerbated by the Council's Noise Guidelines (AD52), with a minimum of 38 sites potentially affected by environmental noise issues as defined therein. WB Properties Ltd (213.361) and (212.401) and supporting documents RD086-094, refer to supporting document 'North Lanarkshire Land Supply Assessment' April 2018, Geddes Consulting in objecting to Policy PROM LOC 3 on the grounds that there is an identified shortfall in the NLC Housing Land Supply as evidenced in several recent Appeals, the Site Selection Methodology Assessment (AD25) is flawed, there is an over reliance on existing allocations within the Community Growth Areas and Ravenscraig, which have experienced little progress to development stage, and further allocations of effective housing sites are required. The Council's planned demolitions by 2024 will have a further negative impact on housing land supply. Daniel Smith (271) also refers to a Report to the Council's then Planning & Transportation Committee in 2013. Ogilvie Homes (190) adds that the Housing Land Requirement set out in the Modified Proposed Plan should include a 20% generosity allowance and not the currently identified 10%.

Hallam Land Management (208) and supporting document RD075, and Taylor Wimpey (225.300) and (225.306) object to the Council's Housing Land Supply across the whole Authority All-Tenure, Airdrie & Coatbridge Housing Sub-Market Area, All Tenure and Private, based on completions to date, and the planned demolitions by 2024, stating there is an identified shortfall of the five year effective housing supply and this is demonstrated in the table provided within the objection.

Robertson Homes (238) and supporting document RD200, objects to the approach taken in presenting the Housing Development Sites within the Modified Proposed Plan and considers that additional housing sites are required to meet housing demand.

Daniel Smith (271) repeats the claim that the Council's completions figures are overstated

and goes on to object to the Council's Local Housing Strategy and its strategic approach to housing allocations, stating that an effective Needs and Demand Assessment should be carried out for every settlement and that there is a significant demand for social housing in a number of Motherwell Housing Sub-Market Area villages that is unlikely to be met by the approach currently taken by NLC.

Colin Nicholson (282) objects wording of the Policy on grounds it is misleading, confusing and lacks clarity.

Monkland Glen Community Council (287) objects to the Council's approach to maintaining an effective supply of housing land by Housing Sub-Market Area on the grounds that this is risky and could lead to destruction of sites (Green Belt) outwith the proposed urban area.

Authority's Summary of Objections to Existing Housing Development Sites

Gartcosh Tenants & Residents Association (179) objects to Existing Housing Site NLSK40442A Gartcosh (Map Book page 7.3).

Neil John Diamond (200) objects to Existing Housing Site NLMK0533 former Bargeddie Primary School, Coatbridge Road, Bargeddie (Map Book 9.3).

Sharon Jones (249), Amanda McConville (251), Emma Blyth (252) and Argyle (289) object to Existing Housing Site NLMW1266 Burnhall Place/Mosshall Place, Waterloo (Map Book page 12.6).

Trustees of Douglas Support Estate (260) acknowledges that the housing figures identified in the Plan accord with Clydeplan Strategic Development Plan, but objects to how this land is currently being delivered, with reference to the lack of building activity on Existing Housing Sites allocated in the Adopted North Lanarkshire Local Plan 2012, specifically in the Coatbridge Local Area Partnership analysis on pages 108 to 111 of the MPLDP.

Maria McShannon (265) objects to the impact of Existing Housing Sites NLMK0442B Glenburn Gardens, Glenboig, Gartcosh & Glenboig Community Growth Area (Map Book 7.3), on the grounds that enough Green Belt has been developed over and the adjacent Core Path should be protected. Other issues raised include matters relating to planning applications and associated concerns of potential breaches of permission.

Alice & Francis Morton (280) object to the impact of Existing Housing Sites at Stepps and across the Northern Corridor LAP area not being properly assessed.

Authority's Summary of Objections to Proposed Housing Development Sites

Margaret Lang (001), Samantha Lang (002), Marina Dolan (003), Josephine Steel (004), Martin Pickering (005), Catrina Pickering (006), Alison (007), Lesley McCormick (008), Paul McCormick (009), Scott McGill (010), Rebecca Weir (011), Michelle McGill (012), Scott Mitchell (013), Diane Mitchell (014), Ian Thomson (015), Caroline Thomson (016), Lynsey Houston (017), Neil Houston (018), Richard Forrest (019), Stephen Miller (020), Emma Louise Miller (021), Mark Brownlie (022), Nicola Brownlie (023), Ryan Fulton (024), Lydia Ellis (025), Nick Johnstone (026), Jillian Johnstone (027), Catherine McKay (028), Tony Paterson (029), Marion Paterson (030), Amy Hunter (031), Mark Fleming

(032), Anne Barr (033), Melissa Lees (034), Graeme Lees (035), Christopher Stone (036), Tracey Stone (037), Cheryl Mooney (038), Siobhan Mooney (039), Colin Nicol (040), Terry Bissessar (041), Hazel Bissessar (042), Mary O'Brien (043), John O'Brien (044), Angela Nicol (045), Marilyn MacFarlane (046), David Gray (047), David Lang (048), Craig McGowan (049), Ailie McGowan (050), Linsey Bryson (051), Allan Leach (052), Anne McGowan (053), Allyson Lachlan (054), Rachel Pettigrew (055), Shannon Frane (056), Stephen Jackson (057), Vicky McLean (058), Tony Cannavan (059), Sean Kelly (060), Mark Paterson (061), Mark Griffin (062), Lynsey McDaid (063), Lynsey Jackson (064), Lynette Cleland (065), Louise Charlton (066), Karen Griffin (067), Joanne Keenan (068), John Lee Thomas (069), John Keenan (070), Jonathan Geddes (071), Ian Moon (072), Graeme Pettigrew (073), Flora Kelly (074), Fiona Geddes (075), Donna Moon (076), David McDaid (077), Brian Macys (078), Ann Macys (079), Graham Hall (080), Clare Hall (081), Laura Weston (082), James Weston (083), Caroline Mooney (084), Jim Mooney (085), Margaret Mooney (086), Mary Ann Frame (087), Shannon Frame (088), Tracey McCulloch (089), Drew McCulloch (090), Heather Richardson (091), Lynda Chang (092), Barry McMillan (093), Susanne McMillan (094), John McLaughlin (095), Francis McLaughlin (096), Bridget Mathison McLaughlin (097), Billy Paterson (098), Joanna Docherty (099), Mark Thomson (100), Emma Thomson (101), Julieann Kerrigan (102), Kathleen Brunton (103), Louise Sutherland (104), Craig Hunter (105), Zac Hunter (106), Gillian Hunter (107), Audrey Duffy (108), James Duffy (109), Sarah Duffy (110), Lyndsay Harrold (111), Stephen Harrold (112), Alistair Grant (113), Marion Cumbertson (114), Jack Murdoch (115), Pauline Graham (116), Alan Wilson (117), Clare Quigley (118), John Harper (119), Robert McKendrick (120), Newmains & District Community Council (121), Anne Harper (122), Mr Martyn Forrest (123), Martyn Forrest (124), Lynne MacDonald (125), Alan Cameron (126), Lyanne Cameron (127), Margaret M McCaul (128), Maryann Milne (129), John McAllister (130), Mairi McAllister (131), Scott McIlvaney (132), Corrina Summers (133), Ian Summers (134), Logan Summers (135), Eileen McIlvaney (136), Kirsty Forrest (137), Patricia Clark (138), Rachael Smith (139), Stephen Dickson (140), Daniel Smith (141), Morven Thomson (142), William McCaul (143), Lisa Neilson (144), Gary Neilson (145), Oliver Lang (146), Joseph Currie (147), Marianne Currie (148), Scott Podmore (149), Lynn Podmore (150), Sharon Campbell (151), Fiona Murdoch (152) object to the allocation of Proposed Housing Site 20/19, at Morningside, Newmains (Map Book page 12.6), for housing.

Alistair McDonald (154), Ann MacDonald (155), Cheryl Scott (156), Alex Coles (157), Laura McReady (158), Ian Hamilton (159), Paul McAtamney (160), James Dickie (161), Geraldine Ward (162), Lawrence Ward (163), George Burns (164), Michael Burns (165), Moira Burns (166), Graeme & Susan Brough (167), Lisa Bradley (168), Jamie Bradley (169), Cathy Holmes (171), Iain MacDonald (172) object to the allocation of Proposed Housing Site 06/17 High Street, Newarthill (Map Book page 10.5) and Taylor Grange Developments (170.215) and supporting documents RD001-007, objects to the allocation of Proposed Housing Site 06/17, at Main Street/Biggar Road, Newarthill (Map Book page 10.5), for housing, on the grounds that insufficient land has been allocated.

Taylor Grange Developments (170.287) and supporting documents RD008-017, supports allocation of Proposed Housing Development Site 07/20 Garrion Bridge, but objects to the non-allocation of the whole of Glasshouse Developments (Scotland) Ltd's holdings at Garrion Bridge (SM044).

Lisa Dolson (193), Bryce Baxter (194), Elizabeth Baxter (195), Sam Orr (196), Hugh Weir (197), Brian Dolson (198), Helen Barr (199) and Neil John Diamond (200) object to the allocation of Proposed Housing Development Site 02/09 Coatbridge Road, Bargeddie

(Map Book page 9.3).

Patricia Dixon (203) objects to the allocation of Proposed Housing Site 01/07, east of Stirling Road, Stand (Map Book page 7.5), for housing.

WB Properties Ltd (212.271) and supporting documents RD082-085, objects to the non-allocation of Proposed Regeneration Site 02/13, west of Bellshill Road, Uddingston (Map Book 10.3), specifically as a Proposed Housing Development Site on the grounds that the site is fully effective and the Council was minded to grant planning permission for Application 17/00518/PPP subject to S75.

Stewart Milne Homes (216.274) and supporting documents RD114-118, supports inclusion of Proposed Housing Development Site 03/08, at Mosside Farm, Airdrie, but objects to the western boundary as shown on Map 8.4, seeking an extension to include the whole of CfS/MIR Site 0003/08 put forward.

J & P Hannaway (227) and supporting documents RD161-175, supports the allocation of Proposed Housing Development Site 07/11 Sykeside Road, Airdrie (Map Book page 9.4), but objects to the whole of CfS/MIR Site 0007/11 not being allocated.

Ian Telford (229) objects to the allocation of Proposed Housing Development Site 08/07 Dykehead Road, Airdrie (Map Book page 8.4), on grounds that it should have been excluded on the basis of the Site Assessment Methodology Report, only to be allocated following the Urban Boundaries Review.

George Dougal (233) objects to the allocation of Proposed Housing Development Site 10/01 Lammerknowes Road, Banton (Map Book page 3.4).

Claire McCallum (235) and Sandra McCumisky (236) object to the allocation of Proposed Housing Development Site 13/19, Victoria Park, Newmains (Map Book 12.6).

Claire McCallum (235) also objects to the allocation of Proposed Housing Development Site 23/19 Cambusnethan Street, Newmains (Map Book page 12.6).

Ian MacFarlane (253) objects to the allocation of Proposed Housing Development Site 11/07 Easterton Place, Caldercruix (Map Book 7.6).

Cumbernauld Village Community Council (270) objects to the allocation of Proposed Housing Development Site 04/04 Village Primary School, Cumbernauld (Map Book page 4.5).

Auchinloch Community Council and Northern Corridor Community Forum (277) object to the allocation of Proposed Housing Development Site 18/05 The Neuk, Auchinloch (Map Book page 6.2), along with Proposed Housing Development Sites 04/05, 10/05 and 29/05 (Map Book page 6.3), on the grounds that the Urban Boundaries Review is a spurious exercise and the sites are not required.

<u>Authority's Summary of Objections to Non-Allocated CfS/MIR Sites</u>

Ogilvie Homes (188.235) and supporting documents RD018-026, objects to the removal of CfS/MIR Site 0009/02 Westerwood Golf Club Cumbernauld (SM031) that had been in the original Proposed Plan. Ogilvie Homes (188.237); (188.238) and (187.247) and

supporting documents RD027-042, object to the non-allocation of CfS/MIR Sites 0007/02 Site A Dunning Drive, Cumbernauld (SM032), CfS/MIR Site 0008/02 Site B Dunning Drive, Cumbernauld (SM033), and CfS/MIR Site 0006/02 King's Drive/Queen's Drive, Westerwood, Cumbernauld (SM028 and SM029) as Proposed Housing Development Sites. Delta Westerwood Property Ltd (191) and supporting documents RD046-051, objects to the non-allocation of CfS/MIR Site 0004/02 Westerwood, Cumbernauld (SM051), as a Proposed Housing Development Site on the grounds that the Council's Site Selection Methodology was flawed. Walker Group (Scotland) Ltd (192) objects to the non-allocation of CfS/MIR Site 0010/02, at North Muirhead Farm, Westerwood, Cumbernauld (SM037), as a Proposed Housing Development Site.

Ogilvie Homes (190) and supporting documents RD043-045, objects to the non-allocation of CfS/MIR Site 0012/19 Knownoblehill, Cleland (SM034), as a Proposed Housing Development Site.

Jim Halliday (201.259) and (201.281) object to the non-allocation of Phase 1 CfS/MIR Site 0001/04, at Luggiebank (SM060), and Phases 2&3 CfS/MIR Site 0006/07, Luggiebank (SM061), as a Proposed Housing Development Site.

Manus O'Donnell (202) Objects to the non-allocation of CfS/MIR Site 0001/05, Gartferry Road, Moodiesburn, as a Proposed Housing Development Site.

Aggregate Industries UK Ltd (207) and supporting documents RD067-068, objects to the non-allocation of CfS/MIR Site 0002/01 Croy Quarry, Croy (SM062), as a Proposed Housing Development Site, but acknowledges that part of the Housing Land Audit site NLCNO488 is allocated in the Adopted North Lanarkshire Local Plan. Subsequently through the Local Plan's review, the whole site was included in the Proposed Local Development Plan, but removed in the Modified Proposed LDP and allocated instead as General Urban Area.

Hallam Land Management (208.268) and supporting documents RD069-079, objects to the non-allocation of CfS/MIR Site 0009-06 North Myvot Farm, Condorrat, Cumbernauld (SM050), as a Proposed Housing Development Site.

Ronnie & Alan Bartlett (210) object to the non-allocation of CfS/MIR Site 0002/07 Ryden Mains Farm, Glenmavis (SM063), as a Proposed Housing Development Site on grounds the Plan is not compliant with Scottish Planning Policy paragraph 119 and 122, an identified shortfall in effective housing land supply evidenced by recent appeals.

Chepstow (Holdings) Ltd (214.272), (214.315), (214.316) and (214.318) and supporting documents RD095-112, object to the non-allocation of CfS/MIR Site 0002/15 Kirklees Road, Mossend (SM035), and CfS Sites 0022/05, 0023/05 and 0024/05 Glaudhall Farm, Muirhead (SM036) as Proposed Housing Development Sites for the reasons stated within the accompanying documents.

Stewart Milne Homes (216.274) and supporting documents RD114-118, objects to the partial allocation of CfS/MIR Site 0003/08 Mosside Farm, Airdrie (SM064), as Proposed Housing Development Site 03/08 (Map Book page 8.4).

Stewart Milne Homes (216.313) and supporting documents RD119-123, objects to the non-allocation of CfS Site 0020/05, Burnbrae Road, Auchinloch (SM039), as a Proposed Housing Development Site, for the reasons stated within the accompanying documents.

Taylor Wimpey Strategic Land (218) and supporting document RD127, objects to the non-allocation of CfS/MIR Site 0003/13, at Newlands Farm, Tannochside (SM040) on grounds that more housing allocations are required to meet housing demand.

Upland Developments Limited (226) and supporting documents RD159-160, objects to the non-allocation of CfS/MIR Site 0007/05 Woodhead Road, Muirhead (SM030), as a Proposed Housing Development Site.

Beechwood Investments (228.291) and supporting documents RD177-178, objects to the non-allocation of CfS/MIR Site 0009/01 Currymire Farm, Kilsyth (SM065), for mixed-use housing (specifically provision for over 55s) and commercial/retail development.

Maritsan Developments Ltd (230) and supporting document RD179, objects to the non-allocation of CfS/MIR Site 0009/20 east of Overtown (SM066) as a Proposed Housing Development Site.

Airdrie Golf Club (237) and supporting documents RD198-199, objects to the non-allocation of CfS/MIR Site 0016/07 Airdrie Golf Club, Airdrie (SM068), as a Proposed Housing Site on the grounds the site has been excluded from the plan due to a mistake in the application of the Council's Site Sustainability and Deliverability Matrix. The site scores better than any of the sites included in the Airdrie Local Area Partnership and should be allocated to support sustenance and redevelopment of the golf course and clubhouse.

The objection submitted by Robertson Homes (238) and supporting documents RD200, to the approach taken in presenting the Housing Development Sites is presented earlier in this Schedule 4. However, in addition, specific reference is made to the non-allocation of CfS/MIR Site 0017/05 Broomknowes Farm, Auchinloch (SM069), as a Proposed Housing Development Site.

T Gorman Haulage Ltd (239) objects to the non-allocation of CfS/MIR Site 0017/07 Burnhead Road, Airdrie (SM038), as a Proposed Housing Development Site.

Albert Bartlett & Sons (Airdrie) Ltd (242) objects to the non-allocation of CfS/MIR Site 0024/07 Drumshangie Moss, Airdrie (SM018), as a Proposed Housing Development Site, on the grounds the site capacity is understated and should be updated within the Plan as per the extant planning application 18/01785/PPP. (Link to Proposed Housing Development Site 01/07).

Goldcrest Partners LLP (246) and supporting document RD210, objects to the non-allocation of CfS/MIR Site 0034/05, Adamswell Farm, Mollinsburn (SM059), as a Proposed Housing Development Site.

Springfield Properties PLC (247) and supporting document RD211, objects to the non-allocation of CfS/MIR Site 38-05, Bedlay Estate, Chryston (SM054), as a Proposed Housing Development Site.

<u>Authority's Summary of Objections promoting Sites New to the NLLDP Process</u>

Arrandale Ltd (204) and supporting documents RD052-63 and RD252-255, objects to the non-allocation of site South of Edinburgh Road, Newhouse (SM001), for mixed use including business and industry and housing, on the grounds that there is significant

opportunity for new employment development in this area and there is an identified shortfall in North Lanarkshire Council's effective Housing Land Supply (evidenced through recent appeal decisions) and this will be further negatively impacted by the Council's planned demolitions by 2024.

Hallam Land Management (209) and supporting documents RD80-81, objects to the non-allocation of land at Dullatur Golf Club, Dullatur, Cumbernauld (SM007), as a Proposed Housing Development Site. Its objection to the approach taken in presenting the Housing Development Sites within the Modified Proposed Plan and that additional housing sites are required is outlined earlier in this Schedule 4.

WB Properties Ltd (213.358) and (213.359) object to the non-allocation land south and north of Torbothie Road, Shotts (SM072 and SM073), Wilson Developments (Scotland) Ltd (269) objects to non-allocation of land west of Glenmavis Road, Glenmavis (SM004), WB Properties Ltd (213.361) and (212.401 and supporting documents RD086-094) object to non-allocation of land west of Wishaw Low Road, Cleland (SM009 and SM010). Objections to the housing land supply are dealt with in the Housing Land Supply/Wording part of this Schedule 4.

Beechwood Investments (228.288) and supporting document RD176, objects to the non-allocation of land off Mill Road, west of Banton (SM070 and SM071), on the grounds there is a shortfall in the 5 year housing land supply, as evidenced by several recent appeal decisions. The Council's planned demolitions of some 1,600 flats by 2024 has not been dealt with in any detail in the Proposed Plan and additional land should be allocated to address this.

Kapital Residential Ltd (234) and supporting documents RD196-197, objects to Existing Housing Development Sites NLCN0471 and NLCN1040 on the grounds that neither provide adequate affordable housing and the additional allocation of two sites at South Myvot Chapelton 1 and Chapelton 2 (SM014 and SM015) can address this.

Central Scotland Green Network Trust (254) and supporting documents RD213-215, objects to the settlement boundary around Shotts and the non-allocation of Site 1 and 2 at Hillhouseridge, Shotts (SM006) as Proposed Housing Development Site(s) on grounds existing housing allocations are limited in scope and scale.

Strockweld (257) and supporting documents RD216-217, objects to land at Main Street/Marion Street (including the former Derby Inn), Mossend (SM025), within the Mossend Strategic Business Centre and instead allocate as a Proposed Housing Development Site, on the grounds that in comparison to the current Adopted Local Plan Policy EDI1, there is a lack of flexibility in the Modified Proposed Plan policies PROM LOC 2, PP 2A Purpose of Place Policy and AD 2A Amount of Development Policy, which fail to allow for opportunities for non-business use in appropriate locations, such as where this would involve development compatible with adjacent residential areas or in circumstances where there is a surplus supply of business/industrial land already available, as evidenced in North Lanarkshire Council's Places for Business and Industry Charrette Background Report. (AD30)

Miller Homes (259) and supporting documents RD221-226, objects to the non-allocation of land at Drumpellier (Ryefield), Coatbridge (SM017), for housing.

Sir Frank Mears Associates (261) objects to the proposed settlement boundary change in

the Modified Proposed Plan, this will stifle the potential for a comprehensive masterplan for the whole site to be brought forward to the east of Biggar Road between Biggar Road and the A73, Cleland (SM003), which should be allocated for a mixed use development site. A masterplan approach will allow for extraction of resources within the site including its remediation and restoration.

Orchard Brae Ltd (278) objects to the non-allocation of land south of Airdrie, at Calderbank (Orchard Brae) (SM013), for residential-led, mixed-use development on the grounds that there is an identified housing land shortfall and additional Green Belt land release is needed to address this. There is an extant planning application for a Proposed Residential-led Mixed Use Development Masterplan including Residential (mix of types/tenures), Local Neighbourhood Centre, Education Facilities, Retail, Petrol Filling Station, Food and Drink Uses, Public House, Hotel and Associated Facilities, leisure uses, healthcare, community facilities, energy centre, new parkland, open space and landscaping, associated access arrangements, parking and infrastructure (EIA Development) (18/00890/PPP) and is pending consideration.

MN & JJ Robbins Suffolk Life SIPP (284) and supporting documents RD244-246, objects to the non-allocation of land at Reema Road, Bellshill (SM074), for a mixed use development as indicated on the supporting Masterplan document.

Joeswood Estates (285.388) and (285.389) and supporting documents RD247-248, object to the non-allocation of Sites 1 and 2 at Joeswood, Gartcosh (SM005 and SM012), as a Proposed Housing Development Site and Commercial/ Leisure Development Site, on the grounds that insufficient land has been allocated as required by Scottish Planning Policy. They also object that in the event of a shortfall, the Council will direct development towards non-effective sites. Rather, the Council should have an allowance of effective sites to ensure there is no shortfall.

Rhiannon Properties Ltd (286) objects to the non-allocation of land at Townhead Farm, Newarthill (SM075), as a Proposed Housing Development Site. Its objection relating to the Housing land Supply, etc, is outlined earlier in this Schedule 4.

Modifications sought by those submitting representations:

<u>Modifications sought through Housing Land Supply/Policy PROM LOC 3 Wording</u>

Gartcosh Tenant Resident Association (179) seeks rewording of Policy to make it clear that development will not be supported on unallocated sites, except in exceptional circumstances.

Ogilvie Homes (189) seeks that the following amendments are made to the wording of Policy PROM LOC 3:

the following sentence is added after the first set of bullet points, “The Council, in collaboration with Homes for Scotland, will monitor, on an annual basis, the effectiveness of the identified 5 year supply of land for housing.”
the first phrase of the second paragraph, ending with the words “by the Council” is amended to “In the event of a shortfall in the effective 5 year supply of housing land being identified”
the locational preference relating to “*Sites outwith the proposed Urban Area with no protection designation”* is moved up to second on the list of sequential preferences.

Manus O'Donnell (202) seeks the deletion of the proposed sequential approach in the Policy in favour of a "Strategic Development Plan Policy 8" approach and remove existing sites that have been "demonstrably non-effective for a number of years" in preference of additional sites.

Hallam Land Management (208) and Wallace Land Investments (219) seek that the Council's site selection methodology is disregarded and replaced with a transparent site assessment for all sites submitted. Wallace Land Investments (219) seeks the deletion of the sequential order of preference for application sites in the absence of a five-year effective housing land supply, with the Council adopting a system that supports effective proposals that contribute to sustainable development, in line with Clydeplan Strategic Development Plan and Scottish Planning Policy.

Hallam Land Management (208), Wallace Land Investments (219), Barratt Homes West Scotland (231.305), Barratt Homes West Scotland & CALA Homes (West) Ltd (264), Cala Homes (West) Ltd (245) and Miller Homes (259) seek the following amendment to the wording of deletion of Policy PROM LOC 3:

DELETE: [*North Lanarkshire Council will maintain a minimum 5-year effective supply of land for housing in each housing sub-market area at all times, through supporting and directing new housing development to the sites identified in the Plan and Housing Land Supply. This comprises of:*

- *new sites identified as Proposed Housing Sites in this plan;*
- *Effective sites identified in the 2017 Housing Land Audit;*
- *new sites with planning permission granted between 1 April 2017 and 30 June 2018.*
- *Strategic Housing Investment Programme*

In the event of a shortfall identified by the Council, or the existing supply becoming substantially taken up ahead of programming forecasts, North Lanarkshire Council will seek to direct development towards sites considered non-effective in the most up-to-date, agreed Housing Land Audit. Any additional sites will be assessed using the following site sequence location criteria:

Sites within the proposed Urban Area with no protection designation will be considered first,

Then

- Sites within the urban area and protected by a local designation or proposed policy; then
- *Sites within the urban area and protected by a national designation then*
- Sites outwith the proposed Urban Area with no protection designation then
- Sites outwith the proposed Urban Area and protected by a local designation then
- *Sites outwith the proposed Urban Area and protected by a national designation*

Sites protected by an international designation will not be considered acceptable]

INSERT: [*North Lanarkshire Council will provide a generous supply of land to maintain a minimum of five year effective housing land supply at all times for each housing sub-market area and the local authority area to meet the housing supply targets set out in Clydeplan. Progress in meeting the housing supply targets will be monitored using housing completions to date and the programming of the effective housing land supply set out in the agreed housing land audit.*

Where it is demonstrated that a five year effective housing land supply is not maintained at all times by local authority area and/or housing sub-market areas, both brownfield and greenfield sites may be granted planning permission across the local authority area. In such a circumstance, the presumption in favour of development that contributes to sustainable development will be a significant material consideration. Sites will be supported where it is demonstrated that the following criteria are satisfied:

• *the development will help to remedy the shortfall identified;*
• the development will contribute to sustainable development;
• *the development will be in keeping with the character of the settlement and the local area;*
• the development will not undermine Green Belt objectives; and,
• *any additional infrastructure required as a result of the development is either committed or to be funded by the developer.*]

Amendment of the second sentence in *Prom LOC3 Guidance* as follows:

[*The site criteria set out in the Policy PROM LOC3 are based on the criteria set out in Clydeplan Strategic Development Plan Policy 8 as the steps required of local authorities to remedy shortfalls in the five year housing land supply.*]

Amendment of Appendix *Housing Land Requirements* as follows: DELETE: [*The Council will promote regeneration and sustainable growth through delivering the right amount of development in the right places, developed to the right quality, and for the benefit of the communities they affect.*

The supply of sites to satisfy housing demand, including a minimum 5-year effective supply of land for housing in each housing sub-market area at all times. The Area Strategies contain the details of the allocated land supply for each area.

This comprises:

• the 2017 Housing Land Audit Effective sites;
• *new housing development sites promoted as proposed sites in the Modified Proposed Plan, and*
• *new sites with planning permission granted between 1 April 2017 and 30 September 2018.*
• the Council's Strategic Housing Investment Programme]

INSERT: [*The Council will promote regeneration and sustainable economic growth to ensure that provisions are made to meet the housing land requirements set out in Clydeplan.*

The Council will provide a generous supply of land to maintain a minimum of five year effective housing land supply at all times for each housing sub-market area and the local authority area. Progress in meeting the housing supply targets will be monitored using housing completions to date and the programming of the effective housing land supply set out in the agreed housing land audit.

The Area Strategies contain the details of the land supply based on the Housing Land Audit 2017. Clydeplan requires up to date housing land supply data to be adopted to inform this Local Development Plan. Housing Land Audit 2018, once agreed with

housebuilding and infrastructure providers, will provide the most up to date housing land supply data from 2012 to 2029.

Where it is demonstrated that a five year effective housing land supply is not maintained at all times by housing sub market area and / or local authority area, further housing developments on greenfield or brownfield sites may be granted planning permission where they are in accord with Policy PROM LOC3 POLICY Housing Development Sites.]

Deletion of:

- "Step" table and text on page 139
- Table 1, Table 2 and text on page 140
- Table 3, Table 4 and text on page 141
- Table 5, Table 6 and text on page 142
- North Lanarkshire Ambition and text on page 143

Insertion of:

Table 1 All-Tenure North Lanarkshire Housing Land Requirement

	2012- 2024	2024-2029	2012-2029
Housing Land Requirement. Source: Clydeplan SDP	14,630	6,100	20,730
Housing Completions (2012 to 2017) Source: Housing Land Audit	4,673	0	4,673
Planned Demolitions Source: Ambition Programme	1,700	0	1,700
Programming of Effective Land Supply Source: Housing Land Audit	9,046	2,477	11,523
Surplus or Shortfall Scale of Additional Allocations Required	-2,611	-3,623	-6,234

Table 2 Private by Housing Sub-Market Area Housing Land Requirement

	2012- 2024	2024-2029	2012-2029
Housing Land Requirement. Source: Clydeplan SDP	2,900	1,210	4,110
Housing Completions Source: Housing Land Audit	1,104	0	1,104
Programming of Effective Land Supply Source: Housing Land Audit	2,790	997	3,787

Surplus or Shortfall Scale of Additional Allocations Required	994	-213	781
Airdrie and Coatbridge HSMA	*2012 - 2024*	*2024 - 2029*	*2012 - 2029*
Housing Land Requirement Source: Clydeplan SDP	*4,060*	*1,690*	*5,750*
Housing Completions Source: Housing Land Audit	*1,195*	*0*	*1,195*
Programming of Effective Land Supply Source: Housing Land Audit	*1,592*	*656*	*2,248*
Surplus or Shortfall Scale of Additional Allocations Required	*-1,273*	*-1,034*	*-2,307*
Motherwell HSMA	*2012- 2024*	*2024- 2029*	*2012- 2029*
Housing Land Requirement Source: Clydeplan SDP	*4,640*	*1,930*	*6,570*
Housing Completions Source: Housing Land Audit	*1,637*	*0*	*1,637*
Programming of Effective Land Supply Source: Housing Land Audit	*2,637*	*824*	*3,497*
Surplus or Shortfall Scale of Additional Allocations Required	*-330*	*-1,106*	*-1,436*

Table 3 Private by North Lanarkshire Housing Land Requirement

	2012- 2024	2024- 2029	2012-2029
Housing Land Requirement Source: Clydeplan SDP	11,590	4,830	16,420
Housing Completions Source: Housing Land Audit	3,936	0	3,936
Programming of Effective Land Supply Source: Housing Land Audit	7,055	2,477	9,532
Surplus or Shortfall Scale of Additional Allocations Required	-599	-2,353	-2,952

Wallace Land Investments (220), Goldcrest Partners LLP (246) and Rhiannon Properties Ltd (286) seek that the first section of the second paragraph of the Policy, ending with the

word "Council", should be reworded to read as follows:

"In the event of a shortfall in the effective 5 year supply of housing land being identified", the locational preference relating to "*Sites out with the proposed Urban Area with no protection designation"* be moved up the list of sequential preferences so as to sit in second place on the list and that the following sentence be added after the first set of bullet points listed within the Policy.

"The Council, in collaboration with Homes for Scotland, will monitor, on an annual basis, the effectiveness of the identified 5 year supply of land for housing."

Albert Bartlett & Sons (Airdrie) Ltd (242) seeks the insertion of the following sentence before the second paragraph on page 29, sentence beginning "In the event of a shortfall identified by the Council…" "the capacity for each Proposed Housing Site should be considered as a minimum amount, subject to increase, in order that a shortfall in effective housing supply be avoided."

Miller Homes (258) seeks the following amendments to the wording of Policy PROM LOC 3:

"North Lanarkshire Council will provide and maintain a minimum 5-year effective supply of land for housing in each housing sub-market (private) and for the local authority area (all-tenure) at all times to enable the Housing Supply Target to be met in full over the target periods set out in Policy 8 of the Strategic Development Plan. This will be achieved through supporting and directing new housing development to the sites identified in the Plan and Housing Land Supply which comprises of:

• new sites identified as Proposed Housing Sites in this plan;
• Effective sites identified in the 2017 Housing Land Audit;
• new sites with planning permission granted between 1 April 2017 and 30 June 2018.
• Strategic Housing Investment Programme

In the event of a shortfall in the 5 year effective land supply ~~identified by the Council~~, or the existing supply becoming substantially taken up ahead of programming forecasts, North Lanarkshire Council will seek to direct development towards ~~sites considered non-effective in the most up-to-date, agreed Housing Land Audit~~ sustainable windfall sites which are capable of delivering completions in the next 5 years. ~~Any additional~~ Proposed windfall sites will be assessed in accordance with paragraph 33 of Scottish Planning Policy. ~~using the following site sequence location criteria: Sites within the proposed Urban Area with no protection designation will be considered first, then~~
~~1. Sites within the urban area and protected by a local designation or proposed policy then~~
~~2. Sites within the urban area and protected by a national designation then~~
~~3. Sites outwith the proposed Urban Area with no protection designation then~~
~~4. Sites outwith the proposed Urban Area and protected by a local designation then~~
~~5. Sites outwith the proposed Urban Area and protected by a national designation~~

~~Sites protected by an international designation will not be considered acceptable.~~
Homes for Scotland (266) and supporting documents RD235-237, seeks that Policy PROM LOC 3 is amended as follows (additions, ~~deletions~~) Our Full Representation is attached dealing with matters in the round. RD237.

"North Lanarkshire Council will provide a minimum of ~~maintain a minimum~~ 5 years' effective supply of land for housing in each housing sub-market area (private) and for the local authority area (all-tenure and private) at all times to enable the Housing Supply Target to be met in full over the target periods set out in Policy 8 of the SDP., ~~through supporting and directing new housing development to the sites identified in the Plan and Housing Land Supply. This comprises of:~~ This will be monitored annually using housing completions to date and the effective housing land supply set out in the agreed Housing Land Audit.

~~• • new sites identified as Proposed Housing Sites in this plan;~~
~~• • Effective sites identified in the 2017 Housing Land Audit;~~
~~• • new sites with planning permission granted between 1 April 2017 and 30 June 2018.~~
~~• • Strategic Housing Investment Programme~~

~~In the event of a shortfall~~ Where it is demonstrated that a five-year effective land supply is not being maintained at all times identified by the Council, or the existing supply becoming substantially taken up ahead of programming forecasts, North Lanarkshire Council will take prompt action to rectify this by supporting housing proposals which are capable of delivering completions in the next five years and compatible with national policy. A shortfall in the five-year effective land supply is a significant material consideration and the presumption in favour of sustainable development will apply. ~~seek to direct development towards sites considered non-effective in the most up-to-date, agreed Housing Land Audit. Any additional sites will be assessed using the following site sequence location criteria: Sites within the proposed Urban Area with no protection designation will be considered first, then~~
~~• • Sites within the urban area and protected by a local designation or proposed policy then~~
~~• • Sites within the urban area and protected by a national designation then~~
~~• • Sites outwith the proposed Urban Area with no protection designation then~~
~~• • Sites outwith the proposed Urban Area and protected by a local designation then~~
~~• • Sites outwith the proposed Urban Area and protected by a national designation~~

~~Sites protected by an international designation will not be considered acceptable"~~

Daniel Smith (271) no specific modification was sought, but the objection implies that he seeks that need and demand assessments are carried out for all communities within North Lanarkshire, land released to meet this demand, and major sites, which distort allocation figures, are placed in a separate category of sub-market definition.

Colin Nicholson (282) seeks that Policy is explicit in that development will not be supported on unallocated sites, except in exceptional circumstances.

Monkland Glen Community Council (287) seeks that the Green Belt has at least a national designation that prevents its development.

<u>Modifications sought through Objections to Existing Housing Development Sites</u>

Gartcosh Tenants & Residents Association (179) seeks the removal of Existing Housing Site NLSK40442A Gartcosh (Map Book page 7.3).

Neil John Diamond (200) seeks that no planning approval is granted in relation to the

former Bargeddie Primary School, beyond the current permission for six properties, until there are further discussion with roads regarding access and safety.

Sharon Jones (249), Amanda McConville (251), Emma Blyth (252) and Argyle (289) offered no suggested modification.

Maria McShannon (265) seeks the removal of Existing Housing Development Site NLMK0442B Glenburn Gardens, Glenboig (Map Book 7.3), from the Local Development Plan.

Francis & Alice Morton (280) seek that no further land is identified or developed for housing in Stepps and the Northern Corridor, until an impact assessment is conducted.

Modifications sought through Objections to Proposed Housing Development Sites

Margaret Lang (001), Samantha Lang (002), Marina Dolan (003), Josephine Steel (004), Martin Pickering (005), Catrina Pickering (006), Alison (007), Lesley McCormick (008), Paul McCormick (009), Scott McGill (010), Rebecca Weir (011), Michelle McGill (012), Scott Mitchell (013), Diane Mitchell (014), Ian Thomson (015), Caroline Thomson (016), Lynsey Houston (017), Neil Houston (018), Richard Forrest (019), Stephen Miller (020), Emma Louise Miller (021), Mark Brownlie (022), Nicola Brownlie (023), Ryan Fulton (024), Lydia Ellis (025), Nick Johnstone (026), Jillian Johnstone (027), Catherine McKay (028), Tony Paterson (029), Marion Paterson (030), Amy Hunter (031), Mark Fleming (032), Anne Barr (033), Melissa Lees (034), Graeme Lees (035), Christopher Stone (036), Tracey Stone (037), Cheryl Mooney (038), Siobhan Mooney (039), Colin Nicol (040), Terry Bissessar (041), Hazel Bissessar (042), Mary O'Brien (043), John O'Brien (044), Angela Nicol (045), Marilyn MacFarlane (046), David Gray (047), David Lang (048), Craig McGowan (049), Ailie McGowan (050), Linsey Bryson (051), Allan Leach (052), Anne McGowan (053), Allyson Lachlan (054), Rachel Pettigrew (055), Shannon Frane (056), Stephen Jackson (057), Vicky McLean (058), Tony Cannavan (059), Sean Kelly (060), Mark Paterson (061), Mark Griffin (062), Lynsey McDaid (063), Lynsey Jackson (064), Lynette Cleland (065), Louise Charlton (066), Karen Griffin (067), Joanne Keenan (068), John Lee Thomas (069), John Keenan (070), Jonathan Geddes (071), Ian Moon (072), Graeme Pettigrew (073), Flora Kelly (074), Fiona Geddes (075), Donna Moon (076), David McDaid (077), Brian Macys (078), Ann Macys (079), Graham Hall (080), Clare Hall (081), Laura Weston (082), James Weston (083), Caroline Mooney (084), Jim Mooney (085), Margaret Mooney (086), Mary Ann Frame (087), Shannon Frame (088), Tracey McCulloch (089), Drew McCulloch (090), Heather Richardson (091), Lynda Chang (092), Barry McMillan (093), Susanne McMillan (094), John McLaughlin (095), Francis McLaughlin (096), Bridget Mathison McLaughlin (097), Billy Paterson (098), Joanna Docherty (099), Mark Thomson (100), Emma Thomson (101), Julieann Kerrigan (102), Kathleen Brunton (103), Louise Sutherland (104), Craig Hunter (105), Zac Hunter (106), Gillian Hunter (107), Audrey Duffy (108), James Duffy (109), Sarah Duffy (110), Lyndsay Harrold (111), Stephen Harrold (112), Alistair Grant (113), Marion Cumbertson (114), Jack Murdoch (115), Pauline Graham (116), Alan Wilson (117), Clare Quigley (118), John Harper (119), Robert McKendrick (120), Newmains & District Community Council (121), Anne Harper (122), Martyn Forrest (123), Martyn Forrest (124), Lynne MacDonald (125), Alan Cameron (126), Lyanne Cameron (127), Margaret M McCaul (128), Maryann Milne (129), John McAllister (130), Mairi McAllister (131), Scott McIlvaney (132), Corrina Summers (133), Ian Summers (134), Logan Summers (135), Eileen McIlvaney (136), Kirsty Forrest (137), Patricia Clark (138), Rachael Smith (139), Stephen Dickson (140), Daniel Smith (141), Morven Thomson (142), William McCaul

(143), Lisa Neilson (144), Gary Neilson (145), Oliver Lang (146), Joseph Currie (147), Marianne Currie (148), Scott Podmore (149), Lynn Podmore (150), Sharon Campbell (151), Fiona Murdoch (152) seek the deletion of Proposed Housing Development Site 20-19 Morningside, Newmains (Map Book page 12.6), and its retention as Green Belt.

Alistair McDonald (154), Ann MacDonald (155), Alex Coles (157), Laura McReady (158), Ian Hamilton (159), Paul McAtamney (160), James Dickie (161), Geraldine Ward (162), Lawrence Ward (163), Graeme & Susan Brough (167), Lisa Bradley (168), Jamie Bradley (169), Cathy Holmes (171) and Iain MacDonald (172) seek the deletion of Proposed Housing Development Site 06/17 Main Street/Biggar Road, Newarthill, and its retention as Green Belt.

Cheryl Scott (156), George Burns (164), Michael Burns (165), Moira Burns (166) offered no suggested modification.

Taylor Grange Developments (170.215) seeks the expansion of Proposed Housing Development Site 06/17 (Map Book page 10.5) to match the whole of CfS/MIR Site 0006/17 (SM058).

Taylor Grange Developments (170.287) and supporting documents RD008-017, seeks an expansion to the boundary of Proposed Housing Development Site 07/20 Garrion Bridge (SM044) as shown in its Masterplan.

Lisa Dolson (193); Bryce Baxter (194); Elizabeth Baxter (195); Hugh Weir (197); Ben Dolson (198); Neil John Diamond (200) seek the deletion of Proposed Housing Development Site 02/09 Coatbridge Road, Bargeddie (Map Book page 9.3), and its retention as Green Belt.

Sam Orr (196) and Helen Barr (199) offered no suggested modification.

Patricia Dixon (203) seeks the deletion of Proposed Housing Development Site 01/07 east of Stirling Road, Stand (Map Book page 7.5), and its retention as Green Belt.

WB Properties Ltd (212.271) and supporting documents RD082-085, seeks that Proposed Regeneration Site 02/13 Bellshill Road, Uddingston (Map Book 10.3), is formally re-allocated as Proposed Housing Development Site 02/13.

Stewart Milne Homes (216.274) and supporting documents RD114-117, seeks a westward expansion to Proposed Housing Site 03/08 Mosside Farm, Airdrie (Map Book 8.4), to include the whole of CfS/MIR Site 0003/08 (SM064), as shown in its Location Plan.

J & P Hannaway (227) and supporting documents RD161-175, seeks a southern expansion to Proposed Housing Development Site 07/11 Sykeside Road, Airdrie (Map Book 9.4), to include the whole of CfS/MIR Site 0007/11, as shown in its Location Plan.

Ian Telford (229) seeks the deletion of Proposed Housing Development Site 08/07 Dykehead Road, Airdrie (Map Book 8.4).

George Dougal (233) seeks the deletion of Proposed Housing Development Site 10/01 Lammerknowes Road, Banton (Map Book 3.4), its retention as Green Belt and proposes an alternative site within the Upper Kelvin Valley that equates to the whole of CfS/MIR

Site 0010/01 (SM076).

Claire McCallum (235) and Sandra McCumisky (236) seek the deletion of Proposed Housing Development Site 13/19 Victoria Park, Newmains (Map Book 12.6). Claire McCallum (235) also seeks the deletion of Proposed Housing development Site 23/19 Cambusnethan Street, Newmains (Map Book 12.6), unless to make it into protected woodland.

Ian MacFarlane (253) seeks the deletion of Proposed Housing Development Site 11/07 Easterton Place, Caldercruix (Map Book 7.6).

Cumbernauld Village Community Council (270) seeks deletion of Proposed Housing Development Site 04/04 Village Primary School, Cumbernauld (Map Book 4.5), and its allocation as General Urban Area.

Auchinloch Community Council and Northern Corridor Community Forum (277) seek that the Urban Boundaries Review changes are disregarded, and the deletion of Proposed Housing Development Sites 18/05 the Neuk, Auchinloch (Map Book 6.2), 04/05 Lanrigg Old Lindsaybeg Road, Chryston, 10/05 Gartferry Road, Moodiesburn, and 29/05 East of Auchengeich Road, Moodiesburn (Map Book 6.3).

<u>Modifications sought through Objections to Non-Allocation of Sites Submitted at CfS/MIR</u>

Ogilvie Homes (188.235); (188.237); (188.238); (189) and (190) and supporting documents RD018-045, seek the allocation of CfS/MIR Sites 0009/02 Westerwood Golf Club (SM031), 0008/02 Site A Dunning Drive (SM032), 007/02 Site B Dunning Drive (SM033), 0006/02 King's Drive/Queen's Drive (SM028 and SM029), all Westerwood, Cumbernauld, and 0012/19, Knownoblehill, Cleland (SM034) as Proposed Housing Development Sites.

Delta Westerwood Property Ltd (191) and supporting documents RD046-051, disregard NLC's *Environmental Report SEA Site Sustainability Assessment* and *Background Report Site Selection Methodology* and re-assess all sites on an equal and transparent basis, using a consistent methodology, and seeks the allocation of CfS/MIR Site 0004/02 West of Westerwood, Cumbernauld (SM051), as a Proposed Housing Development Site. Walker Group (Scotland) Ltd (192) seeks the allocation of CfS/MIR Site 0010-02 North Muirfield Farm, Westerwood, Cumbernauld (SM037), as a Proposed Housing Development Site.

Jim Halliday (201.259) and (201.281) seek the allocation of CfS/MIR Sites 0010/04 and 0006/07 Luggiebank (SM060 and SM061), as Proposed Housing Development Sites.

Manus O'Donnell (202) seeks the allocation of CfS/MIR Site 0001/05 Gartferry Road, Moodiesburn, as an extension to Existing Housing Development Site NLSK0441.

Aggregate Industries UK Ltd (207) and supporting documents RD067-068, seeks the reinstatement of North Lanarkshire Local Plan allocated site NLCNO488 Croy Quarry and/or extension of the whole of CfS/MIR Site 0002/01 (SM062).

Ronnie & Alan Bartlett (210) seek the allocation CfS/MIR Site 0002/07 Ryden Mains Farm, Glenmavis (SM063), as a Proposed Housing Development Site.

Chepstow (Holdings) Ltd (214.272); (214.315); (214.316) and (214.318) and supporting documents RD095-112, seek the allocation of CfS/MIR Sites 0002/15 Kirklees Road, Mossend (SM035), 0022/05, 0023/05 and 0024/05, Glaudhall Farm, Muirhead (SM036), as Proposed Housing Development Sites.

Stewart Milne Homes (216.313) and supporting documents RD119-123, seek the allocation of CfS/MIR Site 0020/05, Burnbrae Road, Auchinloch (SM039), as a Proposed Housing Development Site.

Taylor Wimpey (225.276), (225.300) and (225.306) and supporting documents RD152-158, seek the allocation of CfS/MIR Sites 0003/13 Newlands Farm, Uddingston (SM040), 0011-05 & 0012/05 Stepps, 0015-07 Meldrum Mains, Glenmavis (SM021), as Proposed Housing Development Sites.

Upland Developments Ltd (226.284) and supporting documents RD159-160, seeks the allocation of CfS/MIR Site 0007/05 as a Proposed Housing Development Site (SM030), specifically for the development of a modern retirement village.

Beechwood Investments (228.291) and supporting documents RD177-178, seeks the allocation of CfS/MIR Site 0009/01, at Currymire, Kilsyth (SM065), for a mixed-use development of housing (including specialist accommodation), commercial and retail.

Maritsan Developments Ltd (230) and Barratt Homes West Scotland (231.294) and supporting documents RD179-186, seek the allocation of CfS/MIR Site 0009/20 Overtown (SM066 and SM067), as a Proposed Housing Development Site.

Airdrie Golf Club (237.307) seeks the allocation of CfS/MIR Site 0016-07 and more (supporting documents RD198-199) Airdrie Golf Club, Airdrie (SM068), as a Proposed Housing Development Site.

Robertson Homes (238.308) and supporting document RD200, seeks the allocation of CfS/MIR Site 0017/05, Broomknowes Farm, Auchinloch (SM069), as a Proposed Housing Development Site.

T Gorman Haulage (239) seek the allocation of CfS/MIR Site 0017/07 Burnhead Road, Airdrie (SM038), as a Proposed Housing Development Site.

Springfield Properties PLC (247) seeks the allocation of CfS/MIR Site 0038/05, Bedlay Estate, Chryston (SM054), as a Proposed Housing Development Site.

<u>Modifications sought through Objections promoting Sites New to the NLLDP Process</u>

Arrandale Ltd (204) and supporting documents RD052-063 and RD252-255, seeks the removal of site (SM001) from Green Belt and allocation as proposed mixed use development for both Business and Industry and Housing.

Hallam Land Management (209) and supporting documents RD80-81, seeks the allocation of Green Belt land at Dullatur Golf Club, Dullatur, Cumbernauld (SM007), as a Proposed Housing Development Site.

WB Properties Ltd (212.401) and (213.361) and supporting documents RD082-094, seek the allocation of Green Belt land west of Wishaw Low Road, Cleland (SM009 and

SM010), as a Proposed Housing Development Site and for this to be listed in the Wishaw Local Area Partnership Area Strategy and relevant Map Book.

WB Properties Ltd (213.358) and (213.359) seek the allocation of Countryside land north and south of Torbothie Road, Shotts (SM072 and SM073), as Proposed Housing Development Sites and for these to be listed accordingly in the Wishaw Local Area Partnership Area Strategy and relevant Map Book.

Beechwood Investments (228) and supporting documents RD176, seeks the allocation of Green Belt land either side of Mill Road, Banton (SM070 and SM071), as a Proposed Housing Development Site.

Kapital Residential Ltd (234) and supporting documents RD196-197, seeks allocation of Green Belt land south of Chapelton Road, Auchenkilns, Cumbernauld (SM014 and SM015), as Proposed Housing Development Sites.

Central Scotland Green Network Trust (254) and supporting documents RD213-215, seeks the north-eastern expansion of the Shotts settlement boundary into Countryside to include Site 1 and Site 2 (SM006) identified in the accompanying Hillhouseridge, Shotts Context Plan as Proposed Housing Development Site(s).

Strockweld (257) and supporting documents RD216-217, seeks the removal of land at Main Street/Marion Street (including the former Derby Inn), Mossend (SM025), from its Strategic Business Centre designation and its allocation as a Proposed Housing Development Site.

Miller Homes (259) and supporting documents RD221-226, seeks the allocation of Green Belt land Ryefields, Glasgow Road, Drumpellier (SM017), as a Proposed Housing Development Site.

Trustees of Douglas Support Estate (260) Though not mentioned in the objection to Policy PROM LOC 3, it is assumed from the overall representation made, the modification sought is the removal of land at Douglas Support Estate, Bellshill, from the Green Belt and its allocation as a Proposed Housing Development Site.

Sir Frank Mears Associates (261) seeks the eastward expansion of the settlement boundary of Cleland into Green Belt land from Biggar Road (SM003) to the A73 for a mixed use development opportunity.

Wilson Developments (Scotland) Ltd (269) seeks the allocation of Green Belt land west of Glenmavis Road, Glenmavis (SM004), as a Proposed Housing Development Site and for this to be listed in the Airdrie Local Area Partnership Area Strategy and relevant Map Book.

Rhiannon Properties Ltd (276.391) and supporting document RD242, seeks the allocation of Green Belt land at Townhead, Newarthill (SM075), as a Proposed Housing Development Site.

Orchard Brae Ltd (278) seeks the allocation of Green Belt land south of Airdrie, at Calderbank (Orchard Brae) (SM013), as a Proposed Housing Development Site, to be delivered as per the accompanying Phased Plan, and for this to be listed in the Airdrie Local Area Partnership Area Strategy and relevant Map Book.

MN & JJ Robbins Suffolk Life SIPP (284) and supporting documents RD244-246, seeks the allocation of Strategic Business Centre land at Reema Road, Bellshill (SM074), for a mixed-use development including both Housing and Employment as indicated on the supporting Masterplan document.

Joeswood Estates Ltd (285.388) and (285.389) and supporting documents RD247-248, seek the allocation of Green Belt land (Sites 1 and 2 at Joeswood) south of Gartloch Road, Gartcosh (SM005 and SM012), as a Proposed Housing Development Site and a Commercial/Leisure Development Site respectively.

Summary of response by planning authority:

Housing Land Supply/Policy PROM LOC 3 Wording

Such is the complexity and variety of objections made and the resultant modifications sought, it is helpful to give some form of structure to the Council's response.

Completions/NB2 Data

Hallam Land Management (208), Taylor Wimpey (225.300) and (225.306), and Daniel Smith (271) question the completions figures used by the Council and the discrepancy with Scottish Government Private Housing Completion Certificate Data sets (more commonly known as NB2s) to try and demonstrate that completions in North Lanarkshire are not keeping pace with programming, that the completions recorded in the annual Housing Land Audit are overstated, despite these being implicitly agreed by Homes for Scotland, based on site inspections and discussions with on-site agents of the developing company, and that more housing land should be released as a consequence. This is a common approach used by Homes for Scotland and its members in Local Development Plan Examinations across Scotland and which has gained some level of traction in Decision Notices, the objectors refer loosely to "recent Appeal decisions".

In order to establish how many houses remain required to be built over a period of time, it is of fundamental importance to have accurate data on how many houses have actually been completed as that period progresses. The Council has never questioned that these un-built houses still need to be built, merely that the land on which to build them is still there, remains allocated, remains part of the supply and does not need effectively to be allocated twice for the purpose.

It is important to note that the use of NB2 data to demonstrate approval rates of completion certificates is not advocated in any Scottish Government Guidance at this present time, namely Scottish Planning Policy (AD60) Paragraph 123 and Planning Advice Note 2/2010 – Affordable Housing and Housing Land Audits (AD64) paragraph 41.. Paragraph 123 of Scottish Planning Policy states that:

"Planning authorities should…. work with housing and infrastructure providers to prepare an annual housing land audit… to … monitor the availability of effective housing land, the progress of sites…, and housing completions…"

Moreover, paragraph 41 of Planning Advice Note 2/2020 (AD64)states:

"Planning authorities should therefore carry out regular monitoring of housing completions and the progress of sites through the planning process. This can be achieved through the

preparation of a housing land audit, carried out annually by the planning authority in conjunction with housing and infrastructure providers"

The importance of Scottish Planning Policy (AD60) paragraph 123 and Planning Advice Note 2/2010 (AD64) was underscored by the Reporter in paragraphs 19 and 63 of the West Dunbartonshire Local Development Plan Examination Report (AD70), which state *"…it is clear from paragraph 123 of Scottish Planning Policy and from Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits that the national expectation is for housing land audits to be used as the main tool for monitoring the housing land supply*" and "*reference…to monitoring the land supply through the housing land audit is sufficient because this encompasses the monitoring of completion rates.*" respectively. The Council's approach is consistent with this finding.

To reiterate this point, approved Scottish Government guidance does not state anywhere that Completion Certificate data from the separately legislated Building Standards process should be used. The optimum tool for collecting data on the effectiveness of housing land and how many completions have been achieved is through the Housing Land Audit, the sole method advocated by the Scottish Government.

The Council monitors housing land through site inspections to verify completions and occupancy. Occupancy is a key planning consideration, as it means that the individual house is no longer part of the supply available to a household. This approach is commonly used throughout the 8 Authorities in the Clydeplan Strategic Development Plan Area and is a robust method of monitoring completions through the Housing Land Audit process. It is stressed that the Housing Land Audit process is agreed with Homes for Scotland each year in terms of <u>both</u> completions <u>and</u> programming for future years. This approach was accepted by the Reporter in Appeal Decision PPA-260-2074 Land north west of Leverndale Hospital, Crookston Road, Glasgow, where it was:
"accepted by both parties that Homes for Scotland provide comments on the programming and capacities of sites within the future supply set out in the HLA and that these figures represent the remaining capacity of known housing sites….. I am not therefore persuaded that the audit should be set aside in preference to the NB2 data." (paragraph 22, page 4)

"Completions" are not defined within Scottish Planning Policy (AD60), or Planning Advice Note 2/2010 (AD64), so the Council feels strongly that its approach to monitoring completions is an accepted and well established method throughout the Clydeplan Strategic Development Plan Area and that this approach accords fully with Scottish Government guidance.

NB2 data is not scrutinised and verified to any extent, unlike other datasets gathered by Scottish Government, for example, Scottish Vacant and Derelict Land Survey (SVDLS) data, and is also not subject to any robust and specific guidance on its collection, to ensure that it can be said to be comparably standardised across Scotland, again unlike the Scottish Vacant and Derelict Land Survey. It should be recognised accordingly that the Scottish Government does not separately verify the data, but is entirely reliant on the data submitted from Local Authorities. Once again, this differs markedly from the approach taken with the Scottish Vacant and Derelict Land Survey.

All of this should also be viewed through the prism of physical completion of a house being different from the "planning completion" of a house, i.e., when it becomes occupied and can no longer be considered to be part of the supply.

It should also be noted that the NB2 data that Homes for Scotland has used includes all private sector completions, whereas, as set out in Planning Advice Note 2/2010 (AD64), Housing Land Audits only look at completions of 4 or more units. Therefore, any comparison between the completions in Housing Land Audits and NB2s is not immediately like-for-like, so cannot be considered robust and relevant. The Council is strongly of the view that the evidence provided in the Council's agreed Housing Land Audit (2018) should be considered to be the most reliable means of understanding completions within North Lanarkshire.

As well as being agreed by Homes for Scotland annually, Audit completions are backed by data from Council Tax First Registration records, which are also based on occupancy. Over the 6 years 2012-2018, the table below shows that Council Tax data is more consistently in-line with the completions set out in the Council's annual Housing Land Audits than those in NB returns, allowing for the inclusion of sites under 4 units within the Council Tax data. This supports the robustness of the Housing Land Audit data.

	Housing Completions			
	Housing Land Audit	Council Tax Data	Completion Certificates	SG Housing Statistics (NB)
2012/13	823	849	523	543
2013/14	889	881	601	733
2014/15	886	1,073	824	840
2015/16	993	1,124	772	588
2016/17	1,082	1,125	835	466
2017/18	1,131	1,283	924	640
TOTAL	5,804	6,335	4,479	3,810

In his decision to uphold Planning Appeal PPA-320-2135, land West of Morningside, Morningside, Newmains, at Paragraph 26, the Reporter found that Council Tax first registration is an "*appropriate indicator that a house has been complete and ready for occupation and that there appeared to be a far closer correlation between the HLA/Council Tax data than the NB2/Council Tax data*". The impact of this is that the completions figures in the Council's Housing Land Audit can be taken to be a robust and reliable. The inescapable upshot of this is that several thousand more houses have actually been completed in North Lanarkshire, resulting in a considerably reduced amount of uncompleted programmed units that require to be programmed for completion over the remainder of the period and land allocated for them to be built on.

The Council contends that, since there is no requirement in Scottish Government Guidance, and the reliability of the NB2 dataset is in at least questionable, that the Reporter should disregard those parts of any representation that use NB2 data to "demonstrate" a shortfall in the allocation of land for houses.

Housing Land Requirement

As North Lanarkshire is a Clydeplan Strategic Development Plan Authority, it is a matter of fact that the Proposed Plan has to contain allocations for sufficient houses to satisfy the Requirement laid down in Clydeplan Strategic Development Plan (AD59), enabled by Policy 8 and set out in schedules 8, 9 and 10. This was emphasised by the Reporter at paragraph 6 in the West Dunbartonshire Local Development Plan 2 Examination Report

(AD70). The figures contained in those schedules are derived from the Clydeplan Housing Need & Demand Assessment (AD68). In his decision to uphold Planning Appeal PPA-320-2135, land West of Morningside, Morningside, Newmains, at Paragraph 21, the Reporter seemed to agree, finding that "*a target that was based upon the housing land requirement would impose an expectation to deliver more houses within the next five years than has been calculated to be required*". It is also worth stressing that the Land Requirement is identified in order that the Target is met. The Requirement is not the number of houses that have to be built, but the amount of land that has to be allocated so that the Target can be met. The Reporter at confirmed this in Paragraphs 21 and 22 of the West Dunbartonshire Local Development Plan 2 Examination Report (AD70). This definitional nuance is often overlooked in being presented at appeal by the housebuilding industry and its representatives, exacerbating the claims that the Council overstates completions to underestimate programming. Further reinforcement comes in Paragraph 23 of the West Dunbartonshire Local Development Plan 2 Examination Report (AD70) "*The final sentence of paragraph 119 of Scottish Planning Policy makes it clear that the objective of the housing land allocation of the plan is to enable the housing supply target to be met. This interpretation is supported in paragraph 115 of Scottish Planning Policy where the housing supply target is defined as the number of homes the authority has agreed will be delivered*."

In relation to the Housing Need & Demand Assessment, Daniel Smith (271) contends that the results should provide details for the amount of houses needed for each of the settlements within a local authority area. This is not what is set out in Scottish Planning Policy, or Clydeplan Strategic Development Plan, which can only be broken down to Local Authority-wide and Housing Sub-Market Area. The Council does not consider it necessary, or practicable to break the Housing Need & Demand Assessment to individual settlement level.

The notion of generosity is raised by Ogilvie Homes (190) in asking for 20% to be set as the figure. To do so would put the Plan into conflict with Clydeplan Strategic Development Plan, which clearly states that 15% generosity is added to the Housing Supply <u>Target</u> to result in the Housing Land Requirement. This is backed forcibly by the Reporter at Paragraph 27 of the West Dunbartonshire Local Development plan Examination Report (AD70); *"…However my focus, based on … Scottish Planning Policy, is on…securing a generous land supply to enable the remaining Clydeplan delivery target to be met.*" The Council does not consider it appropriate to arbitrarily raise the level of generosity to 20%.

Manus O'Donnell (202), Wallace Land Investments (219) and (220), Barratt Homes West Scotland (231.294) and (231.305), Miller Homes (258), Hallam Land Management (209), Barratt Homes West Scotland & Cala Homes (West) Ltd (264), Homes for Scotland (266), Orchard Brae Ltd (278) contend specifically that the Local Development Plan is not in compliance with Clydeplan. In claiming that the Plan represents a shortfall, Ogilvie Homes (188.237); (188.238); (189) and (190), Delta Westerwood Property Ltd (191), Arrandale Ltd (204), Hallam Land Management (208), Taylor Wimpey (225.300) and (225.306), WB Properties Ltd (212.401) and (213.361), Daniel Smith (271) are basically making the same point.

Table 1 below demonstrates how the allocations in the Plan fulfil its Clydeplan requirements through their inclusion in the 2017 Housing Land Audit baseline year. It is worth stressing that the table is an amalgamation of the 3 relevant Clydeplan Schedules, so that they are presented in one place. Of course, this is all bearing in mind that page 91 of the Modified Proposed Plan shows an allocation of 20,910 houses, consisting of the

2017 Effective Housing land Supply, 2018 Strategic Housing Investment Programme, Planning Permissions granted between April 2017 and January 2019, with Proposed Housing Development Sites added on top.

Table 1

Area and Tenure	Clydeplan Plan Period Agreed HLA Completions (2013-17 Agreed HLAs)	2017 Agreed Housing Land Audit Established Housing Land Supply	Clydeplan: Schedule 7 North Lanarkshire Housing Supply Targets Whole Period	North Lanarkshire Housing Land Requirements & Private Housing Land Requirements by HMSA Whole Period	Private HMSA Housing Supply Targets Calculated from Clydeplan Private HMSA Land Requirements Whole Period	(Undelivered at 2017 Base) Schedule 7 and Calculated Housing Supply Targets Whole Period	Requirements Whole Period (Generosity Amended to Reflect Period Completions/Delivery)	Established Housing Land Supply Minus Remaining Clydeplan Whole Period Housing Land Requirement)
AC Private	1,215	4,650	Not in Schedule 7	5,750	5,000	3,785	4,353	297
CN Private	1,168	5,157	Not in Schedule 7	4,110	3,574	2,406	2,767	2,390
MW Private	1,553	9,699	Not in Schedule 7	6,570	5,713	4,160	4,784	4,915
NL Private Total	3,936	19,506	14,280	16,420	Use Schedule 7	10,344	11,896	7,610
NL Social Total	737	2,706	3,740	4,310	Use Schedule 7	3,003	3,453	-747
NL All-Tenure Total	4,673	22,212	18,020	20,730	Use Schedule 7	13,347	15,349	6,863

Table 1 shows an All-Tenure surplus across North Lanarkshire and within the Private Sector allocations in each of its constituent Housing Sub-Market Areas.

The whole period shortfall in the social-rent sector is an inevitable consequence of the different way in which social housing is delivered across shorter time periods, dependent upon short-term funding cycles. However, the funding cycles also take into account the Strategic Housing Investment Programme, which is updated annually and is basically a record of which sites are to benefit from the grant funding supplied by the Scottish Government for the Council and other Registered Social Landlords to disburse.

In any case, a report to the Council's Enterprise & Housing Committee on 10 May 2018 the Economic Regeneration Delivery Plan was approved, stating that the Council is committed to providing 5,000 new homes for rent by 2035, consisting of 4,450 new build and 550 purchased from the private sector. The Council rests on its demonstration that the allocations made in the Local Development Plan satisfy its Clydeplan Strategic Development Plan (AD59) Policy 8 obligations through Schedules 8, 9 and 10. It is stressed that this is all that that is required of the Council.

Hallam Land Management (208), Ronnie & Alan Bartlett (210), Taylor Wimpey (225), Miller Homes (258) and (259), Homes for Scotland (266), WB Properties Ltd (212.401) and (213.361), Daniel Smith (271), Ogilvie Homes (190), Cala Homes (West) Ltd (245) and Rhiannon Properties Ltd (286.391) challenge the sufficiency of the allocations made in the Plan. The Clydeplan period is 2012-2029, split at 2012-2024 and 2024-2029. The Housing Land Audit 2017 on which the Plan is based contains programming from 2017-2024. Completions from 2012-2017 are taken from the Housing Land Audit, implicitly agreed by Homes for Scotland in annual discussions surrounding programming. If Homes for Scotland comments on programming and capacity, there is a *de facto* acceptance of the completions figure. As stated earlier, the Council's figures are corroborated by analysis of Council Tax first registration and the endorsement of the appropriateness of that data source by the Reporter in upholding Planning Appeal PPA-320-2135. Consequently, any arguments put forward by objectors have been shown to be insufficiently robust, unreliably pessimistic and not a true reflection of the situation. The use of unreliable data means that there is little to be served by line-by-line agreement/rebuttal of the various tables supplied by objectors.

The various tables supplied by Hallam Land Management (208), Wallace Land Investments (219), Taylor Wimpey (225.300) and (225.306), Barratt Homes West Scotland (231.305), Cala Homes (West) Ltd (245), Miller Homes (259) and Barratt Homes West Scotland & Cala Homes (West) Ltd (264) appear to accept the completions figure from the Housing Land Audit, but then go on to list "0"s for programming 2024-2029. The appearance of "0" in 2024-29 is potentially dramatic, but substantively misleading in that that period has not been programmed as yet, as it is beyond the 7-year effective period outlined in the Housing Land Audit 2017. To use this to derive the shortfall lacks logic, or robustness, as of course there will be completions during that period, albeit they are beyond programming at this time. The Reporter at the West Dunbartonshire Local Development Plan 2 Examination (AD70) was similarly unconvinced by this specific argument, stating in Paragraphs 40 and 55 that *"…Homes for Scotland's alternative analysis… appears to take no account of any contribution from sites not programmed to commence within the 7-year time horizon… I expect the Homes for Scotland figures underplay 2024-30 completions. I … find no … reason not to accept … council's estimates … post 2024.*" and *"…it would appear reasonable to assume that effective land not taken up before 2024 would be available after 2024*."

Significantly, the Reporter at Morningside Appeal PPA-320-2135 also clarified that it is the Housing Supply Target that is the key. The Council has always contended that generosity cannot be applied to that part of the supply that has been completed, because the houses are built and have already contributed towards meeting the Target. Clarification was also provided on the principle that the Land Requirement is a tool by which the Development Plan allocates sufficient land to meet the Target, not the Requirement per se.

The notion of "disputed sites" is another avenue favoured by the housebuilding industry and its representatives. Disputed sites is that element of the Housing Land Audit upon which the Council and Homes for Scotland basically agree to disagree. Regardless of which side wins which argument that hinges upon the presence of "disputes" at any particular point in time, the land remains allocated and part of the supply.

Hallam Land Management (208) raised the specific issue of the Council's Noise Guidance (AD52) impacting upon the sufficiency of the Council's land supply. Principally, this is dealt with in the Schedule 4 for Policies EDQ 2 & 3, but, essentially the Council

recognises that "Noise Guidance for New Developments" (AD52) does not constitute Supplementary Guidance in its present format and is developing Supplementary Guidance in line with the most up-to-date legislation and guidance, to be subject to consultation before adoption. In the meantime, developers are directed towards the "Noise Guidance for New Developments" (AD52). In short, this issue does not have the alarmingly negative impact claimed by the objector.

In conclusion, the Council considers that the allocations made in the Modified Proposed Plan are sufficient to achieve the Housing Supply Target identified by the Clydeplan Housing Need & Demand Assessment (AD68) and that it accords consequently with Clydeplan Strategic Development plan (AD59), so accords consequently in turn with Scottish Planning Policy.

It is worth pointing out that as a result of planning permission, a significant number of additional houses have now been added to the supply that were not part of the Modified Proposed Plan. Once the Section 75 is concluded, Application 18/00463/PPP (minded to grant June 2019) for the Revised Ravenscraig Masterplan will result in a further 1,000 houses being added to the capacity. The point above about non-effective sub-elements of an overall active, effective site is particularly relevant here. In September 2019, Application 18/01851/FUL was granted permission for 146 houses at Glenmavis on land not included in the Modified Proposed Plan as it had previously been considered non-effective following its inclusion in North Lanarkshire Local Plan.

The impact of these is to add over 1,100 houses to the allocations made in the Plan and illustrate graphically the point of the non-effective land supply reservoir.

In response to the objection from Homes for Scotland (266) regarding the absence of an Action Programme, it is the Council's interpretation that such a document is required to be submitted for Examination alongside the Plan.

<u>Site Sustainability and Deliverability Matrix</u>

Several objectors make various statements challenging the efficacy of the Council's site selection process and the accuracy or otherwise of individual site scores contained in its Site Sustainability and Deliverability Matrix. The Council's Site Selection Methodology Background Report (AD25) sets out the genesis, concept and implementation of the site selection process from the Scottish Government's North Lanarkshire Local Plan "Adoption" letter to the Council in September 2012 (AD65), through the North Lanarkshire Local Development Plan Call for Sites Questionnaire in 2013, Main Issues Report in 2015 (AD21), North Lanarkshire Local Development Plan Main Issues Report Report on Responses and Site Options Consultation (AD22) in 2016, to the North Lanarkshire Local Development Plan Modified Proposed Plan

It would be inappropriate to regurgitate these documents verbatim, but the salient points are worth drawing out.

Scottish Government advises the Council to carry out a rigorous assessment of the effectiveness of the existing land supply and a range of ambitious options explored with the aim of achieving a truly generous supply of genuinely effective housing land on a range of sites.

In order to establish genuine effectiveness of sites, the Council compiled a set of criteria

against which any sites submitted to the process may be required to be assessed. This was also a response to the thrust of the Planning Scotland Act 2006 and its clear change in emphasis towards placemaking and the need to move away from the previous purely housing numbers-based approach and the almost inevitable "beauty parade"/"site top trumps" that ensued. At its simplest, if a Council has allocated sufficient land for the sufficient number of houses identified through a Housing Need and Demand Assessment, then it doesn't matter if "better" sites exist, or were discarded.

Consultation on the North Lanarkshire Local Development Plan Main Issues Report saw respondents endorse the criteria and the only areas within North Lanarkshire to which it would apply; Airdrie/Coatbridge Housing Sub-Market Area and South Wishaw Mini-Charrette Study Area. The corollary of that is that any sites presented that were outwith those areas were not considered, rendering any arguments over individual scores in individual boxes irrelevant. Crucially, in line with Placemaking principles, if the sites allocated within those areas can be considered effective, then the same logic applies to arguments about other sites being "better".

<u>Sequential Approach</u>

In similar vein, Manus O'Donnell (202), Wallace Land Investments (219) and (220), Barratt Homes West Scotland (231.294) and (231.305), Miller Homes (258), Hallam Land Management (209), Barratt Homes West Scotland & Cala Homes (West) Ltd (264), Maria McShannon (265), Homes for Scotland (266), Colin Nicholson (282) take issue with the Council's intention to introduce a sequential approach to guide the location of housing development in the event that a shortfall in the 5-year supply of effective land becomes apparent during a Plan period. Some object to the order of the sequence and some object to the approach in its entirety.

Cala Homes (West) Ltd (245), Miller Homes (258) and (259) and Rhiannon Properties Ltd (286) do not think that there should be a sequential approach at all and that neither should non-effective sites be used as a bolster, on the grounds that planning applications are not "orderly". This argument is illogical and could almost be interpreted as advocating *laissez faire* and the dismantling of the planning system. One of the roles of the planning system is to provide a consistent framework to guide development to places a Planning Authority has exercised its rights to identify, and how any approach is likely to be handled. Policy PROM LOC 3 clearly states that in the event that a shortfall is identified, then the Council has a clear preference for particular types of sites to be brought forward before others. The Sequential approach steps follow the order of preference set out in the site Selection Methodology Background Report (AD25).

The Council believes that Homes for Scotland (266) is mistaken and that the order of preference stated in Policy PROM LOC 3 is entirely in line with Scottish Planning Policy Paragraph 30 and, especially Paragraph 40 in considering the re-use of brownfield land within settlements in the first instance and Clydeplan Strategic Development Plan (AD59) Policy 8 (Miller Homes (258) in seeking to avoid undermining the objectives of the Green Belt. That the Council's sequential approach is entirely in line with Scottish Planning Policy (AD60) Paragraph 40 was reinforced by the Reporter at paragraph 58 of the West Dunbartonshire Local Development Plan Examination Report (AD70). "*Paragraph 40 of Scottish Planning Policy identifies as a policy principle that the planning system should direct the right development to the right place, and within this consider the re-use or re-development of brownfield land before new development takes place on greenfield sites.*"

Hallam Land Management (208), Wallace Land Investments (219) and (220), Rhiannon Properties Ltd (286), Goldcrest Partners LLP (246), Miller Homes (258) and Homes for Scotland (266) helpfully suggest alternative wording for Policy PROM LOC 3 in its entirety. For the reasons outlined above, the Council does not agree that this is necessary. However, the Council recognises that the impression is given that a shortfall is for the Council alone to determine whether it exists and it is accepts that this is not necessarily the case, so if the Reporter is so minded, the Council suggests deleting "…identified by the Council,…" from PROM LOC 3 2nd Paragraph first sentence and replacing it with "… being demonstrated,…" . This reflects that a shortfall isn't a shortfall just because it is claimed, or stated, it has to be demonstrated as fact.

The issue of the Non-effective supply is one that is almost existential. What is the point of having a reservoir of sites where the principle of housing has at the very least been accepted by both the Council and Homes for Scotland, with the main point of contention being programming and when it may or may not start? Some individual sites that are classed as non-effective may be subdivided be future phases of larger sites that are delivering on the ground, e.g., Ravenscraig. The non-effective land supply must be ahead of other sites in the approach. It may be that developers can answer the question to the Council's satisfaction, but it is wholly appropriate in the interests of good planning for the Council to at least seek evidence that it has been considered. As mentioned earlier, the decisions to grant planning permission for more housing capacity at Ravenscraig (18/00463/PPP) and on a site at Glenmavis (18/01851/FUL) that was considered non-effective for several years have resulted in over 1,100 houses being added to the supply and illustrate graphically the point of the non-effective land supply reservoir.

The order of the sequence is the deliberately intended to meet the aims set out in Scottish Planning Policy and Clydeplan Strategic Development Plan in setting out the Council's Spatial Strategy and maintaining the focus of development upon the urban areas in the first instance. Protections affecting urban areas usually come in the form of a building being Listed, or within a Conservation Area, or perhaps consisting of an area of significant open space, or form part of a green network of interconnected amenity spaces. These protections are not necessarily prohibitors to development, but can represent opportunities to enhance the urban fabric, or even secure the continued existence of a Listed Building. Once again, it may be that developers can answer the question to the Council's satisfaction, but it is wholly appropriate in the interests of good planning for the Council to at least seek evidence that it has been considered. Crucially, they do not tend to attract the attention of the housebuilding industry in securing options.
Once these avenues have been exhausted then it is appropriate to consider sites outwith the urban area. It is unclear how this logical, plan-led, clearly stated, place-based approach can be claimed to be anything other than entirely legitimate and appropriate.

<u>Demolitions and the Council's Economic Regeneration Delivery Plan</u>

For the purposes of objections to the Plan, the use of the Council's completions figures seems to have become accepted, after a period during which they relied heavily upon it. However, the objectors have merely moved on to the "next" means of calling the adequacy of the Council's allocations into question. Arrandale Ltd (204), Hallam Land Management (208), Beechwood Investments (228.288) and Homes for Scotland (266) raise the issue of the Council's much publicised aspiration to pursue the phased demolition of all of its residential tower blocks over the long-term, with Phase 1 commencing in early 2020, as set out in its Economic Regeneration Delivery Plan (AD25), that the Council is committed to providing 5,000 new homes for rent by 2035,

consisting of 4,450 new build and 550 purchased from the private sector. The Council rests on its demonstration that the allocations made in the Local Development Plan satisfy its Clydeplan Strategic Development Plan Policy 8 obligations through Schedules 8, 9 and 10. It is stressed that this is all that that is required of the Council. Crucially, the re-provisioning programming (new-build units to replace demolished towers) figure of 2,300 assumes an average replacement rate of 50%. As a consequence, objections made on the grounds that if the Council is demolishing X houses, then land for those X houses should be added to any Requirement that was identified before the announcement was made are mistaken.

This is a wholly specious argument and takes no account of how a social landlord can manage its stock and its tenants over time, representing a fundamental misconception of local authority stock management. North Lanarkshire is the largest local authority landlord in Scotland, having eschewed the wholesale transfer of its stock to a Housing Association. All of the properties affected are in Council ownership, on land owned by the Council.

It sounds almost facetious to state that at the point of demolition, the dwellings are all vacant, but the point is worth stressing, as, by that time all of the affected households have been rehoused. Indeed, the rehousing process has actually been in train for several months through the non-replacement of tenancies that have become voided through natural turnover, as occupants move on, or pass away. So, the argument that 1,700 houses are being demolished, but "you're" only building 800 replacements, so "you" need land for a further 900 just does not stack up, in fact, it is simply not true. As of April 2020, of the 1,700 houses to be demolished, 754 have been voided and 95% of the remaining affected households have agreed a tenancy solution with the Council, meaning only 48 of those 1,700 households require a solution. The Council's New Supply programme has delivered over 750 new homes, with over 150 on site and 500 at the design/application stage. In addition, over 300 homes have been purchased through the Empty Homes and Open Market Acquisition Schemes, the vast majority former council/ Development Corporation stock which had been sold originally under Right to Buy.

The notion of simply transferring any non-built social houses into the private side of the supply is also illogical, given that the houses were always social and their replacements intended to be social and the rehoused tenants intend remaining as social tenants. The Reporter at the West Dunbartonshire Local Development Plan 2 Examination agreed with this in paragraphs 29 and 30 of his Report (AD70). Indeed, paragraph 30 states "*Because these are apparently social rented homes, there is no effect on the private housing land requirements, and no consequent impact on my conclusions on the adequacy of the private sector land supply…*"

If the Council is expected to take planned demolitions into account in "replacement" land allocation, then it follows that it can seek to rehouse affected tenants elsewhere, within existing stock. So, by embarking upon this line of argument, the objectors could have triggered a debate about stock vacancy and the part that voids might play in the overall supply of housing that is available for households to form in. Although it would represent a major departure from accepted practice, a similarly simplistic argument to that used regarding demolitions could hypothetically be applied to stock vacancies. For example, can vacant stock make a contribution towards offsetting any shortfall in all-tenure supply be met by vacant stock? Figures in 2016 showed that North Lanarkshire had 3,306 more houses than it did households. Does this reduce the amount of land required for new houses to be built? As Scotland's largest social landlord, the Council has very accurate

figures for the level of vacant stock in its ownership.

Moving forward, the demolitions programme will form an integral part of any Housing Need and Demand Assessment that will be carried out in respect of the preparation of the next generation of Regional Spatial Strategy/Local Development Plans to replace the current Strategic Development Plan framework.

For those reasons, the Council sees no need to make any changes to the Policy other than as outlined above.

Summary of planning authority response to Objections to Existing Housing Development Sites

Gartcosh Tenants and Residents Association (179) and Maria McShannon (265) Existing Housing Sites NLSK40442A Gartcosh and NLMK0442B Glenburn Gardens, Glenboig, are part of the effective and established land supply as a consequence of Gartcosh & Glenboig Community Growth Area having been designated originally in the Glasgow & the Clyde Valley Joint Structure Plan Third Alteration 2006 (AD67) Approved May 2009) (continued in Clydeplan Strategic Development Plan (AD59) Approved on 24 July 2017) and subsequent Adopted North Lanarkshire Local Plan, implementing the Structure Plan. This attracted a significant number of objections to the Finalised Draft North Lanarkshire Local Plan. The Local Plan Examination began in October 2010 and the Report of Examination published in January 2012. As a result, the allocations of land contained in the Local Plan as making up the Community Growth Area were confirmed. The concerns raised relate to the implementation of the Community Growth Area through the Development Management process. Gartcosh & Glenboig Community Growth Area is no longer a Local Development Plan matter.

Sharon Jones (249), Amanda McConville (251), Emma Blyth (252) and Argyle (289) Existing Housing Site NLMW1266 Burnhall Place/Mosshall Place, Waterloo, is an area of ground that was developed for post-war prefabricated housing, with their road layout still obvious. Although designated as Green Belt, it is clearly part of the urban fabric of Waterloo, albeit as maintained open space, with a play park. The site was identified as suitable for social housing through the annual Strategic Housing Investment Programme. Details, such as layout, facilities, etc., are matters that can be addressed through the Development Management process.

Trustees of Douglas Support Estate (260) The Council is committed to the outcome of the North Lanarkshire Local Plan Examination. As such, it takes the view that Existing Housing Sites allocated in the Adopted North Lanarkshire Local Plan 2012, following confirmation by Reporters as a result of a long and detailed Examination should be given one whole Development Plan cycle to be brought forward. It is worth pointing out that all of the sites so allocated were suggested by owners, agents and builders, including indications of intention to develop. This relates to the whole of North Lanarkshire, not just the Coatbridge Local Area Partnership analysis on pages 108 to 111 of the MPLDP.

Neil John Diamond (200.368) Existing Housing Site NLMK0533 reflects the desire to retain the Listed former Bargeddie Primary School, Coatbridge Road, Bargeddie. The concerns raised relate to the Development Management process and are not a Local Development Plan matter.

Alice & Francis Morton (280) Existing Housing Sites at Stepps and across the Northern

Corridor LAP area have come about through the granting of planning permissions that emanated mainly through the North Lanarkshire Local Plan Examination, which began in October 2010 and concluded with the Report of Examination published in January 2012. Concerns regarding the impact of Existing Housing Sites are no longer a Local Development Plan matter. The following, as shown in AD72, expressed support for the Council's retention of the Green Belt status of land surrounding Stepps and its non-allocation of CfS/MIR Sites 0002/05, 0006/05, 0008/05, 0011/05, 0012/05, 0013/05 and 0014/05 as Proposed Housing Development Sites:- Alice & Francis Morton (280) and Stepps and District Community Council.

Summary of planning authority response to Objections to Proposed Housing Development Sites

Margaret Lang (001), Samantha Lang (002), Marina Dolan (003), Josephine Steel (004), Martin Pickering (005), Catrina Pickering (006), Alison (007), Lesley McCormick (008), Paul McCormick (009), Scott McGill (010), Rebecca Weir (011), Michelle McGill (012), Scott Mitchell (013), Diane Mitchell (014), Ian Thomson (015), Caroline Thomson (016), Lynsey Houston (017), Neil Houston (018), Richard Forrest (019), Stephen Miller (020), Emma Louise Miller (021), Mark Brownlie (022), Nicola Brownlie (023), Ryan Fulton (024), Lydia Ellis (025), Nick Johnstone (026), Jillian Johnstone (027), Catherine McKay (028), Tony Paterson (029), Marion Paterson (030), Amy Hunter (031), Mark Fleming (032), Anne Barr (033), Melissa Lees (034), Graeme Lees (035), Christopher Stone (036), Tracey Stone (037), Cheryl Mooney (038), Siobhan Mooney (039), Colin Nicol (040), Terry Bissessar (041), Hazel Bissessar (042), Mary O'Brien (043), John O'Brien (044), Angela Nicol (045), Marilyn MacFarlane (046), David Gray (047), David Lang (048), Craig McGowan (049), Ailie McGowan (050), Linsey Bryson (051), Allan Leach (052), Anne McGowan (053), Allyson Lachlan (054), Rachel Pettigrew (055), Shannon Frane (056), Stephen Jackson (057), Vicky McLean (058), Tony Cannavan (059), Sean Kelly (060), Mark Paterson (061), Mark Griffin (062), Lynsey McDaid (063), Lynsey Jackson (064), Lynette Cleland (065), Louise Charlton (066), Karen Griffin (067), Joanne Keenan (068), John Lee Thomas (069), John Keenan (070), Jonathan Geddes (071), Ian Moon (072), Graeme Pettigrew (073), Flora Kelly (074), Fiona Geddes (075), Donna Moon (076), David McDaid (077), Brian Macys (078), Ann Macys (079), Graham Hall (080), Clare Hall (081), Laura Weston (082), James Weston (083), Caroline Mooney (084), Jim Mooney (085), Margaret Mooney (086), Mary Ann Frame (087), Shannon Frame (088), Tracey McCulloch (089), Drew McCulloch (090), Heather Richardson (091), Lynda Chang (092), Barry McMillan (093), Susanne McMillan (094), John McLaughlin (095), Francis McLaughlin (096), Bridget Mathison McLaughlin (097), Billy Paterson (098), Joanna Docherty (099), Mark Thomson (100), Emma Thomson (101), Julieann Kerrigan (102), Kathleen Brunton (103), Louise Sutherland (104), Craig Hunter (105), Zac Hunter (106), Gillian Hunter (107), Audrey Duffy (108), James Duffy (109), Sarah Duffy (110), Lyndsay Harrold (111), Stephen Harrold (112), Alistair Grant (113), Marion Cumbertson (114), Jack Murdoch (115), Pauline Graham (116), Alan Wilson (117), Clare Quigley (118), John Harper (119), Robert McKendrick (120), Newmains & District Community Council (121), Anne Harper (122), Martyn Forrest (123), Martyn Forrest (124), Lynne MacDonald (125), Alan Cameron (126), Lyanne Cameron (127), Margaret M McCaul (128), Maryann Milne (129), John McAllister (130), Mairi McAllister (131), Scott McIlvaney (132), Corrina Summers (133), Ian Summers (134), Logan Summers (135), Eileen McIlvaney (136), Kirsty Forrest (137), Patricia Clark (138), Rachael Smith (139), Stephen Dickson (140), Daniel Smith (141), Morven Thomson (142), William McCaul (143), Lisa Neilson (144), Gary Neilson (145), Oliver Lang (146), Joseph Currie (147), Marianne Currie (148), Scott Podmore (149), Lynn Podmore (150), Sharon Campbell

(151), Fiona Murdoch (152) The Council identified this site through the South Wishaw Mini-Charrette (AD26), which considered the delivery of the South Wishaw Community Growth Area identified in Clydeplan Strategic Development Plan (AD59). The infrastructure to support the dispersed pattern of sites that make up the South Wishaw Community Growth Area capacities can be addressed through the Action Programme (AD18) and any subsequent Development Management Programme. The Council considers that this site is appropriate for the development of housing, being an extension of an area of reclaimed land with recently built houses on it. Planning Appeal PPA-320-2135 against the Council's refusal of planning permission in Principle for Application 18/00580/PPP Morningside Road, Morningside, Newmains, North Lanarkshire, was upheld, subject to conditions and conclusion of a Section 75 Agreement. Consequently, Proposed Housing Development Site 20/19 now benefits from a conditioned planning permission and it is for the Development Management process to ascertain whether many of the concerns raised can be alleviated, mitigated, or avoided.

Alistair McDonald (154), Ann MacDonald (155), Cheryl Scott (156), Alex Coles (157), Laura McReady (158), Ian Hamilton (159), Paul McAtamney (160), James Dickie (161), Geraldine Ward (162), Lawrence Ward (163), George Burns (164), Michael Burns (165), Moira Burns (166), Graeme & Susan Brough (167), Lisa Bradley (168), Jamie Bradley (169), Cathy Holmes (171), Iain MacDonald (172), Taylor Grange Developments (170.215) The Council's Urban Boundaries Review Background Report (AD) sets out the genesis, concept and implementation of the Council's rationalisation of its settlement boundaries to reflect Scottish Planning Policy terminology. Proposed Housing development Site 06/17 was allocated on the grounds that it provided a limited opportunity to support the sustainability of Newarthill in terms of service provision. Key Agencies were consulted as part of the consideration of planning application 19/00416/FUL and no objections were raised to development at this site. The new settlement boundary was drawn up to the strong tree line from east to west, the nearest defensible boundary, and to mirror the extent of housing on either side of the permitted site. Any planning-based concerns raised relating to loss of privacy/traffic/drainage and the provision of physical and social infrastructure can be included in the Action Programme and potentially alleviated, mitigated or avoided through the Development Management Process. The Council maintains that this site has been appropriately identified for development in principle and does not agree that it should be removed, or expanded.

Lisa Dolson (193), Bryce Baxter (194), Elizabeth Baxter (195), Sam Orr (196), Hugh Weir (197), Ben Dolson (198), Helen Barr (199) and Neil John Diamond (200.257) The Council's Site Selection Methodology Background Report (AD25) sets out the genesis, concept and implementation of the site selection process, i.e. that a shortfall has been identified in Airdrie/Coatbridge Housing Sub-Market Area and how to address it in the forthcoming Local Development Plan. North Lanarkshire Local Development Plan Main Issues Report Report on Responses and Site Options Consultation (AD22) in 2016 endorsed this approach and various sites at Bargeddie were allocated as a consequence. Impact on local infrastructure is built into the Action Programme. Some of the concerns raised can be alleviated, mitigated or avoided through the Development Management Process. As shown in AD72 it should be noted that A Tinto/Deuchney Properties supports the allocation of Proposed Housing Site 02/09.

Patricia Dixon (203) The Council's Site Selection Methodology Background Report (AD25) sets out the genesis, concept and implementation of the site selection process, i.e. that a shortfall has been identified in Airdrie/Coatbridge Housing Sub-Market Area and

how to address it in the forthcoming Local Development Plan. North Lanarkshire Local Development Plan Main Issues Report Report on Responses and Site Options Consultation (AD22) in 2016 endorsed this approach. Proposed Housing Site 01/07 was allocated as a consequence. Planning permission for Application 18/01785/PPP was granted for 526 houses. Some of the concerns raised can be alleviated, mitigated or avoided through the Development Management Process.

WB Properties Ltd (212.271) Planning permission was granted for Application 17/00518/PPP subject to Section 75 So, although Proposed Regeneration Site 02/13, west of Bellshill Road, Uddingston, now benefits from specific planning permission for housing, there is no detriment to the proponent by retaining the flexibility of its status as a Proposed Regeneration Site, should housing development not prove deliverable.

Stewart Milne Homes (216.274) The western boundary of Proposed Housing Development Site 03/08 was set to take into account concerns raised by the Council's Greenspace service about the potential impact on the integrity of the hydrology of Dunbeth Moss, which occupies much of the area in question. The Council remains of the view that it is inappropriate to extend the western boundary of Proposed Housing Development Site 03/08.

J&P Hannaway (227) Planning Appeal PPA-320-2119 against the Council's refusal of planning permission for Application 16/01649/PPP was dismissed on 30 May 2018. The application boundary matched that of CfS/MIR Site 0007/11. The Reporter found that "*the remaining area of Green Belt land within the site would not be an appropriate location for housing development because of the visual impact of development on the countryside and harm to the setting of the settlement*". This supports the Council's allocation of Proposed Housing Development Site 07/11 Sykeside Road, Airdrie, and not whole of CfS/MIR Site 0007/11.

Taylor Grange Developments (170.287) The allocation of Proposed Housing Development Site 07/20 is restricted to a cleared area formerly developed as greenhouses adjacent to the A71. A further cleared area of former greenhouses downhill to the south, between 07/20 and the River Clyde, is designated as General Urban Area, along with the buildings to the north alongside the A71. As a result, there is no detriment to the proponent by retaining the flexibility to redevelop the site, subject to consideration of any planning application, which would consider a range of factors, such as road access onto the A71 and any potential flood risk from the proximity to the River Clyde. The Council remains of the view that it is in appropriate to extend the boundary of Proposed Housing Development Site 07/20.

Ian Telford (229) The Council's Site Selection Methodology Background Report (AD25) sets out the genesis, concept and implementation of the site selection process, .i.e., that a shortfall has been identified in Airdrie/Coatbridge Housing Sub-Market Area and how to address it in the forthcoming Local Development Plan. North Lanarkshire Local Development Plan Main Issues Report Report on Responses and Site Options Consultation (AD22) in 2016 endorsed this approach. Proposed Housing Site 08/07 was allocated as a consequence.

George Dougal (233) The Council's Urban Boundaries Review Background Report (AD27) sets out the genesis, concept and implementation of the Council's rationalisation of its settlement boundaries to reflect Scottish Planning Policy terminology. Proposed Housing Development Site 10/01 Lammerknowes Road, Banton, was allocated on the

grounds that the site was a logical, limited expansion of the village, contained by housing to the west and road and water courses to the west, north and east. In addition, the Council was concerned about the need to provide some means of supporting the sustainability of Banton as a settlement moving forward, in terms of service provision and school capacity. As well as the proponent, AD72 shows that the following person expressed support for the Council's allocation of Proposed Housing Development Site 10/01 Lammerknowes Road, Banton, Lorraine Stewart.

Claire McCallum (235) and Sandra McCumisky (236) The Council's Site Selection Methodology Background Report (AD25) sets out the genesis, concept and implementation of the site selection process, i.e. that the South Wishaw Mini-Charrette concluded that different approach was required to implement the South Wishaw Community Growth Area was necessary. North Lanarkshire Local Development Plan Main Issues Report Report on Responses and Site Options Consultation (AD22) in 2016 endorsed this approach. Proposed Housing Development Sites 13/19 and 23/19 were allocated as a consequence. Some of the concerns raised can be alleviated, mitigated or avoided through the Development Management Process.

Ian MacFarlane (253) The Council's Site Selection Methodology Background Report (AD25) sets out the genesis, concept and implementation of the site selection process, i.e. that a shortfall has been identified in Airdrie/Coatbridge Housing Sub-Market Area and how to address it in the forthcoming Local Development Plan. North Lanarkshire Local Development Plan Main Issues Report Report on Responses and Site Options Consultation (AD22) in 2016 endorsed this approach. Proposed Housing Site 11/07, surrounded on 3 sides by General Urban Area and contained on its western boundary by a burn, was allocated as a consequence.

Cumbernauld Village Community Council (270) The Council-made Planning Application 19/01484/FUL, was granted planning permission for a "Nursery, and associated vehicle and pedestrian access and car parking" on the on Village Primary School, Cumbernauld. As a result, if the Reporter is so minded, the Council would agree to the deletion of Proposed Housing Development Site 04/04 and its reversion to General Urban Area.

Auchinloch Community Council and Northern Corridor Community Forum (277) The Council's Urban Boundaries Review Background Report (AD27) sets out the genesis, concept and implementation of the Council's rationalisation of its settlement boundaries to reflect Scottish Planning Policy terminology. Proposed Housing Development Sites 04/05, 10/05, 18/05 and 29/05 were rendered untenable as Green Belt as a result of decisions taken at Planning Appeal and the North Lanarkshire Local Plan Examination.

<u>Summary of planning authority response to Objections to Non-Allocation of Sites Submitted at CfS/MIR</u>

At the beginning of its Response to the unresolved issues dealt with through this Schedule 4, the Council has demonstrated that it has met the requirements set out in Clydeplan Strategic Development Plan in terms of the amount of houses that land has been allocated to be developed on. The Action Programme that accompanies the Modified Proposed Plan to Examination demonstrates that these sites are effective and deliverable. As such, and in line with the placemaking principles that underpin Scottish Government thinking and Clydeplan Strategic Development Plan (AD59) Policy 1, there is no need to justify the non-allocation of individual sites, or whether or not any, or all, represent "better" sites than the ones allocated. As the Examination is primarily to deal

with unresolved issues, there is a danger that the process can become skewed towards meeting the needs and aspirations of objectors airing grievances. As such, it is only fair that Reporters are made aware of any support that was submitted for the Council's position in respect of those objections.

In respect of the following objectors Ogilvie Homes (188.235); (188.237); (188.238) and (189), Delta Westerwood Property Ltd (191), Walker Group (Scotland) Ltd (192) As shown in AD72, the following expressed support for the Council's retention of the Green Belt status of various sites at Westerwood, Cumbernauld, and their non-allocation as Proposed Housing Development Sites:- Michael and Janice Muir (236), Mr & Mrs Coats (240), Linda Bellingham (241), Mr A Williams (242), Jim Barton (243), Westerwood Community Council (244), Sheila Scobbie (245), Mrs Alison Lunn (248), Kenneth William (352)

Jim Halliday (201.259) and (201.281) As shown in AD72, the following person expressed support for the Council's retention of the Green Belt status of land surrounding Luggiebank and its non-allocation of any proposed development sites. Colin White (390).

<u>Summary of planning authority response to Objections promoting Sites New to the NLLDP Process</u>

Kapital Residential (234); Albert Bartlett & Sons (Airdrie) Ltd (242); Central Scotland Green Network Trust (254); WB Properties Scotland Ltd (213.358) and (213.359); Wilson Developments (Scotland) Ltd (269); MN & JJ Robbins Suffolk Life SIPP (284); Joeswood Estates Ltd (285.388) and (285.389)

At the beginning of its Response to the unresolved issues dealt with through this Schedule 4, the Council has demonstrated that it has met the requirements set out in Clydeplan Strategic Development Plan (AD59) in terms of the amount of houses that land has been allocated to be developed on. The Action Programme that accompanies the Modified Proposed Plan to Examination demonstrates that these sites are effective and deliverable. As such, and in line with the placemaking principles that underpin Scottish Government thinking and Clydeplan Strategic Development Plan Policy 1, there is no need to justify the non-allocation of individual sites, or whether or not any, or all, represent "better" sites than the ones allocated. As the Examination is primarily to deal with unresolved issues, there is a danger that the process can become skewed towards meeting the needs and aspirations of objectors airing grievances. As such, it is only fair that Reporters are made aware of any support that was submitted for the Council's position in respect of those objections.

Strockweld (257) This objection is dealt with under Issue 03 PROM LOC 2 Business Development Sites.

Sir Frank Mears Associates (261) - As shown in AD72, the following expressed support for the Council's retention of CfS/MIR Site 0025/19 as Green Belt and its non-allocation as a Proposed Housing Development Site. Sir Frank Mears Associates (341) objection includes CfS Site 0025/19:
Andrea Fraser (154), Michelle Smith (155), Paul Smith (156), John Percy (157), Alison Irvine (158), Frank McBride (159), James Dooey (160), Michelle Rae (161), Gavin Rae (162), Adam Rae (163), John Rae (164), John Alcorn (165), Janice Arnott (166), Robert Bell (167), Ellen Bell (168), Deborah Finnie (169), Stacy Banks (170), David Young (171), Margaret McSpadyen (172), Catherine McBride (173), Una Alcorn (174), Robert Alcorn

(175), Simon Kirkwood (176), Derek Fearon (177), Alex Young (180), Mary McFarlane (181), Rebecca Fearon (182), Anna T Kane (183), Gerard Brian McFarlane (184), Miriam Purves (185), Julia Fearon (186), Louise Roarty (187), Christopher Roarty (188), Benny Smith (189), Stephen Roarty (190), Laura Feighan (191), Robert Arnott (192), Pamela McShane (193), Douglas Wilson (194), Leanne Wilson (195), Margo Young (196) and Patrick Ferguson (197).

Reporter's conclusions:

1. My conclusions below are set out into two parts. Part 1 is focused on issues relating to how the adequacy of the housing land supply for the plan period should be established; policy matters; and site selection methodology. Representations which raise matters of relevance to the above issues are addressed below, including those dealt with by the council under issue 1 ('Introduction, Vision and Appendices').

2. Part 2 of my conclusions addresses site-specific representations insofar as is justified by the part 1 conclusions. The council's chosen structuring of its schedule 4 forms has created some overlap and duplication of representations, in some instances across multiple issues. However, the conclusions in this issue in regard to the sufficiency of identified housing land and the scope of the examination are pertinent to our consideration of all site-specific representations.

Part 1

The housing land requirements and adequacy of supply

Housing land requirement

3. The applicable housing land requirements to be met by the proposed LDP are set out in Clydeplan, as outlined in policy 8 and accompanied by precise figures specified in schedules 8, 9 and 10. There is no dispute between the council and representations on this matter.

4. For the avoidance of doubt, Clydeplan policy 8 requires this local development plan to make provision to meet the following housing land requirements for each plan period (2012 – 2024; 2024 – 2029; and 2012 – 2029):

- the all-tenure housing land requirement for North Lanarkshire (schedule 8),
- the private housing land requirement for each housing sub-market area (HSMA) (schedule 9), and
- the private housing land requirement for North Lanarkshire (schedule 10).

5. The housing land requirements applicable to this LDP are summarised in the following table:

Housing land requirement	2012 - 2024	2024 - 2029	2012 – 2029
All tenure, North Lanarkshire	14,630	6,100	20,730
Private, Cumbernauld HSMA	2,900	1,210	4,110
Private, Airdrie and Coatbridge HSMA	4,060	1,690	5,750
Private, Motherwell HSMA	4,640	1,930	6,570
Private, North Lanarkshire	11,590	4,830	16,420

6. The council has referred above to the distinction between the housing land requirement, which includes a generosity margin of 15% set by Clydeplan, and the housing supply target. I agree with the council that the housing supply target represents the (minimum) amount of housing which needs to be built. Whilst the housing land requirement is also expressed as a number of homes, the generosity margin provides flexibility and accounts for the likelihood of some sites in the established supply not coming forward as envisaged, during the applicable plan periods.

7. Whilst I recognise this distinction, the LDP must identify sufficient sites which are effective, or are expected to become effective, to meet each of the above housing land requirements. This aligns with the requirements of both Clydeplan policy 8 and SPP paragraph 119.

8. Clydeplan policy 8 also aligns with SPP paragraph 119 by requiring the LDP to allocate sites to meet the housing land requirements up to year 10 from the expected year of adoption. Based on an assumption that this plan would be adopted by the council during 2021, this means that the plan needs to take account of the period 2029 – 2031, which is beyond the Clydeplan plan period (which is 2012 to 2029).

9. I asked for the council's views on how this matter should most appropriately be addressed by the plan. The council's preferred approach, outlined in response to my further information request, recommends that the Clydeplan housing land requirement be annualised. By multiplying this figure by ten, this could then form the basis of a calculation of whether the LDP provides sufficient land for a ten-year housing land requirement, equivalent to the LDP plan period.

10. The difficulty with the council's preferred approach is that it would fail to account for the plan periods specified in Clydeplan. The housing land requirements outlined in Clydeplan are expected to be met at the end of each period. The council's approach would not take account of this, and instead would spread the requirement over ten years. This could, for example, mask a failure to provide enough housing land by 2024 by providing a more generous supply in the period beyond then to 2031.

11. I find it would be inappropriate to seek to adjust the housing land requirements set by Clydeplan, in order to accommodate the full ten-year LDP period. SPP is instructive that it is for the strategic development plan to set the housing land requirements. It is for the LDP to contain the provisions to meet the housing land requirements; there is no scope for the LDP to adjust or reinterpret the figures set by Clydeplan.

12. It seems to me that the most logical and least problematic means of providing a figure for the period 2029 – 31 not covered by Clydeplan would be to extrapolate a proportionate figure based on the housing land requirements set by Clydeplan. This approach would leave the Clydeplan housing land requirements unaltered, whilst still providing a means for the LDP to account for a full ten years from its adoption. There is no evidence before me which would justify any upward or downward adjustment to the extrapolated figures. This approach is supported by those parties who commented on the council's response to the further information request.

13. I note that the annualised housing land requirement for each Clydeplan plan period is the same, so whether or not the full 2012 – 2029 or the second period from 2024 – 2029 is annualised, the extrapolated extension to 2031 would be the same. The table below outlines the extrapolated housing land requirements:

Housing land requirement	2012 - 2024	2024 - 2029	2012 – 2029	2029 – 2031	2012 - 2031
All tenure, North Lanarkshire	14,630	6,100	20,730	2,439	23,169
Private, Cumbernauld HSMA	2,900	1,210	4,110	484	4,594
Private, Airdrie and Coatbridge HSMA	4,060	1,690	5,750	676	6,426
Private, Motherwell HSMA	4,640	1,930	6,570	772	7,342
Private, North Lanarkshire	11,590	4,830	16,420	1,932	18,352

14. One representation has suggested that the generosity margin be set at 20%, rather than 15% used in Clydeplan. This would have the effect of increasing the housing land requirement for North Lanarkshire, over and above that specified in Clydeplan. In city regions it is for the strategic development plan to consider what would be an appropriate generosity margin. This has been set at 15% and I conclude that it would not be legitimate to re-examine this matter here and it would not be appropriate to alter the housing land requirements stipulated by Clydeplan.

15. In another representation it has been suggested that housing land requirements should be provided at settlement level. There is no requirement for this level of granularity in Scottish Planning Policy, nor would this be consistent with Clydeplan. No modification is therefore required in response to this representation.

Residual housing land requirement – completions to date

16. In order to establish how much housing land is required to be identified in the LDP to meet the housing land requirements set by Clydeplan (and extrapolated to 2031), it is first of all necessary to take account of progress to date, since 2012.

17. Some doubt has been raised in representations over the reliability of the council's completion figures. These are taken from the annual housing land audits, which have been compiled based on site inspections and discussions with developers and/or their agents. The completion figures outlined in the housing land audits are generally somewhat higher than Scottish Government-held completions data, which is based on completion certificates.

18. Neither approach is entirely infallible, although I agree with the council that Scottish Planning Policy and PAN 2/2010 both place emphasis on housing land audits as the principal means of monitoring the housing land supply situation, of which completions are an important component. I would therefore only consider it inappropriate to rely on the housing land audit completions data if it was shown to be demonstrably deficient or erroneous.

19. The council has provided comparative figures to show the annual differences between recorded completions based on the housing land audit, council tax data, completion certificates and Scottish Government housing statistics respectively. This shows that the housing land audit figures have a much closer alignment to council tax first registration records than the Scottish Government completions data (although there are still some notable differences). I share the view of the reporter's findings in appeal PPA-320-2135 which has been referred to me by the council, that council tax records are

an appropriate indicator of a property's completion. As the housing land audit completions data has a closer correlation to council tax first registrations, this indicates that it is likely to be more accurate than the Scottish Government data.

20. A further significant advantage of using the housing land audit completions data is that it provides completions figures for each housing sub-market area, as well as for North Lanarkshire as a whole. This breakdown is not available using Scottish Government data. Given it is necessary for the LDP to make provision for meeting the housing land requirements for each housing sub-market area, it is essential that completions data is also available for each sub-market area. I am therefore satisfied that the housing land audit completions data provides the best available information of its kind for the purposes of this examination.

21. When accounting for completions as part of a calculation of the residual housing land requirements, their relative impact is affected by whether these are deducted from the housing supply targets or housing land requirements. The council's position is that a generosity margin should not be applied to completions, because their contribution to the housing supply target is already confirmed.

22. The purpose of the housing land requirements (through the application of a 15% generosity margin in this case) is to ensure a sufficiently generous supply of land. This in turn should ensure that the housing supply targets set by Clydeplan can be achieved, as well as maximising the likelihood that at least five years supply of effective housing land at all times is maintained. The LDP's need to identify land to meet the housing land requirements in full across the plan period and the generosity margin incorporated within the housing land requirement continues to apply to any completions to date.

23. This has recently been confirmed by the Court of Session. In July 2020 the court allowed an appeal and quashed chapter 7 'Our Homes and Communities' of the Inverclyde Local Development Plan; part of this decision related to how completions ought to be accounted for. On this matter, the court made clear that "the fact that a certain number of houses have been completed does not result in the generosity margin being removed from the number of these completions, as they feature as part of the HLR". In conclusion therefore, the court's position is instructive on this point and I find that completions should be deducted from the housing land requirements. No adjustments should be made to remove the generosity margin from this component of the supply.

24. The table below summarises the most up-to-date position in regard to the residual housing land requirements. The table is based on completions data in housing land audits including the 2019 audit (which is the most recent available), and takes cognisance of my conclusions above in regard to how completions should be accounted for.

		2012 - 2024	**2024 - 2029**	**2012 – 2029**	**2029 – 2031**	**2012 - 2031**
All tenure, North Lanarkshire	HLR	14,630	6,100	20,730	2,439	23,169
	Completions 2012 - 2019	6,950		6,950		6,950
	Residual HLR	7,680	6,100	13,780	2,439	16,219

Private, Cumbernauld HSMA	HLR	2,900	1,210	4,110	484	4,594
	Completions 2012 - 2019	1,854		1,854		1,854
	Residual HLR	1,046	1,210	2,256	484	2,740
Private, Airdrie and Coatbridge HSMA	HLR	4,060	1,690	5,750	676	6,426
	Completions 2012 - 2019	1,488		1,488		1,488
	Residual HLR	2,572	1,690	4,262	676	4,938
Private, Motherwell HSMA	HLR	4,640	1,930	6,570	772	7,342
	Completions 2012 - 2019	2,330		2,330		2,330
	Residual HLR	2,310	1,930	4,240	772	5,012
Private, North Lanarkshire	Private, North Lanarkshire HLR	11,590	4,830	16,420	1,932	18,352
	Completions 2012 - 2019	5,672		5,672		5,672
	Residual HLR	5,918	4,830	10,748	1,932	12,680

Housing land supply

25. I note that the modified proposed plan is based on the 2017 housing land audit. Given the 2019 housing land audit is now available, and notwithstanding that aspects of the audit's findings are disputed, I consider it appropriate for the plan to be updated to reflect the most recent position, and for my assessment and calculations of the housing land supply situation to be based on the most up-to-date evidence. The 2017 housing land audit was in any event also disputed and so I find no overriding reason why a reliance on the 2017 audit would continue to be more appropriate. This is particularly the case given the relatively significant amount of time which has elapsed (and inevitable changes in the supply position) since the publication of the 2017 audit.

26. As stipulated by paragraph 119 of Scottish Planning Policy, local development plans should provide a minimum of 5 years effective land supply at all times. This is expected to be achieved by identifying sufficient land which is effective or expected to become effective, to meet the housing land requirements up to year 10 from adoption. If a housing land audit over-estimates when (or if) housing completions are likely to be delivered on sites, this may present an unrealistic picture of the housing supply situation. This could in turn compromise the plan's ability to maintain an effective 5-year housing land supply, or ultimately its ability to achieve the housing supply targets for the plan periods.

Over-programming of completions

27. In representations (and particularly in comments on the council's response to my further information request), it has been asserted that there has been ongoing, systemic over-programming in North Lanarkshire's housing land audits. In support of this contention, Homes for Scotland have provided figures which compare programmed versus actual completions for audits undertaken between 2008 and 2012, and a pro-rata comparison for the 2013 and 2014 housing land audits (because these provided

programming to 2020 and 2021 respectively, for which actual completions are not yet known).

28. This comparison shows that actual completions have been between 70% and 82% of what had been programmed in each audit. Taken at face value, this would suggest that over-programming is an ongoing issue that gives weight to the argument that the 2019 housing land audit's programming will face a similar fate. However, I find that particular care must be exercised when considering the implications of any conclusions that could fairly be drawn from these figures.

29. First of all, I note that whilst the average actual completions between 2008 and 2015 is 76% of the programmed completions, the accuracy of programming appears to have made a marked and consistent improvement since 2010. The average proportion of programmed completions achieved across the 2010 to 2014 audits (using the pro-rata figures for the 2013 and 2014 audits) stands at 79.6%.

30. Even noting this improvement, it must be acknowledged that the most recent housing land audit being referred to above was undertaken in 2014. Whilst I accept there is some evidence to show a pattern of over-programming, it does not necessarily follow that this must inevitably have continued to occur to the same extent (or at all) in subsequent audits. Indeed, a comparison of actual versus programmed completions to date for the 2015 housing land audit presented in another representation, whilst highlighting that Homes for Scotland's programming was within 1% accuracy, also shows that the audit's programming accuracy was at more than 90% over the period 2015/16 to 2019/20 as a whole.

31. Furthermore, this comparison of programmed versus actual completions accounts for the accuracy of programming which is looking quite some distance into the future. It is almost inevitable that programming for years 4, 5, 6 or 7 will ultimately increasingly deviate from actual completions, given the inherent limitations to being able to accurately programme this far into the future. Generally I would expect the accuracy of an audit's predictions to reduce, the further ahead it looks. The constantly changing nature of the housing land supply situation (which can sometimes see significant and/or unpredictable changes occur in a short period of time) is reflected in the requirement for housing land audits to be undertaken at least annually.

32. By way of comparison and using figures provided in Homes for Scotland's submissions, I calculate that between 2015 and 2019, the average proportion of programmed completions that have come to fruition across years 1 to 3 is over 87%. Using the figures again for the 2015 housing land audit, as set out in another representation, the average actual number of completions for years 1 to 3 was 99% of the audit's programming.

33. As already stated above, over a 5-year period the accuracy of the 2015 housing land audit's programming was greater than 90%. This is significant because whilst the housing land requirement must be used to calculate the adequacy of the effective housing land supply, it must be borne in mind that this incorporates a 15% generosity margin to provide flexibility and to account for the fact that a proportion of sites may not come forward and be developed as anticipated. It is therefore a realistic expectation that actual completions may ultimately be around 15% lower than envisaged by the housing land audit. The required minimum 5-year effective housing land supply must be measured against the housing land requirement, as the generosity margin it incorporates

accounts for the fact that the effective sites it identifies may still, in total, yield less completions than programmed. In my view, the fact that actual completions may not keep pace with what was programmed can perhaps be expected, and it is not itself evidence that the amount of effective housing land identified by that audit must have been overstated at the point at which it was assessed.

34. Representations have highlighted disparities between programmed and actual completions in North Lanarkshire over an extended number of years. Whilst the figures to some extent speak for themselves, based on my own assessment above I conclude that the differences that have occurred have not been of a scale or nature that would indicate that the 2019 housing land audit should be assumed to be the victim of ongoing, systemic over-programming.

The 2019 housing land audit

35. The 2019 housing land audit provides site programming for the period 2019-20 to 2025-26. It also identifies numerous sites which are not effective, either because no completions are programmed within that period and/or because of identified constraints. Paragraph 117 of Scottish Planning Policy states that "The housing land requirement can be met from a number of sources, most notably sites from the established supply which are effective or expected to become effective in the plan period, sites with planning permission, proposed new land allocations, and in some cases a proportion of windfall development."

36. Homes for Scotland disputes the programming assumptions applied to 31 sites, and also the way in which the council is accounting for non-effective sites in its housing land supply calculations. These concerns are widely held and reflected in numerous representations from and on behalf of the housebuilding industry. I deal with both aspects in turn.

37. As a consequence of there being 31 disputed sites, the 2019 housing land audit represents a disputed rather than agreed position between the council and the housebuilding industry. Clearly it would be more desirable to be presented with a housing land audit that does represent a fully agreed position. However, the fact that the status or programming of some sites is disputed does not of itself demonstrate that the housing land audit's assessment is unrealistic, or any less valid than the opposing view.

38. Housing land audits rely on numerous assumptions, professional judgement, and availability of accurate information from developers and landowners. In practice therefore, they are effectively a 'best guess' informed by available evidence. As already outlined above and as shown by looking at predicted and actual completions, invariably the further into the future a site is anticipated to be developed, the more difficult it becomes to make accurate predictions.

39. I have been provided with an overview of the reasons for each site-specific dispute between the council and Homes for Scotland (endorsed in other representations). I have reviewed these, and I find a number of the council's responses to the queries or concerns raised by Homes for Scotland to be inadequate, in that these often do not actually attempt to address the specific matters in hand. However, a critical point here is that it is beyond the scope of this examination to forensically assess or effectively re-run the housing land audit process; it is not an examination of the housing land audit.

40. Even if there was sufficient evidence before me (which there is not) to reach my own conclusions on individual site programming and effectiveness, this would not overcome the fact that whatever conclusions I reached would still be disputed. The question for this examination is therefore whether placing reliance on the 2019 housing land audit's conclusions on site effectiveness and programming would be inappropriate, despite the disputes identified. Homes for Scotland and others have presented an alternative view of site effectiveness and programming, and whilst the council's responses to these site-specific matters have often been lacking, it is not possible for me to reach a conclusive view on what may ultimately be the more accurate programming prediction.

41. Given also that I have found no clear evidence of past audits being fundamentally deficient, in my judgement there would be insufficient grounds to deviate from the 2019 audit's findings and programming. That being said, I recognise that as there are inherent limitations to the audit process, and combined with there being numerous disputed sites, the programmed annual completions need to be treated with some caution. Whilst programed completions are expressed as a precise number of homes, it is important to recognise that programming is not an exact science and some deviation from this is almost certain; past trends indicate that this deviation would likely be downwards rather than upward. Acknowledging this is important, particularly if the adequacy of the housing land supply appears marginal in any instances.

42. The 2019 housing land audit does not provide any programming of sites beyond 2026. Whilst some representations are critical of the lack of site programming by the council to cover the full plan period, the housing land audit is required by Planning Advice Note (PAN) 2/2010 to provide expected completions on sites over the following five years. Nevertheless, appropriate account needs to be taken of sites which are currently either partly or entirely non-effective, where these are expected to become effective and contribute to the effective housing land supply (and housing completions) during the plan period.

43. The council has applied an assumption that all homes which are identified as non-effective in the 2019 housing land audit will be built by the end of 2029. Whilst I would expect there to be some housing completions on these non-effective sites, either as constraints are overcome or through ongoing annual completions on large sites which already have an effective component, I agree with representations that it is unrealistic and without foundation to assume that all of these homes would be completed by 2029, particularly given that this would represent an extraordinary increase in annual completions relative to programming to 2026. The extrapolation of the housing land requirement to 2031 would also have no meaningful bearing on this finding, despite it providing two additional years for the sites to provide housing completions.

44. I have had regard to representations in considering what would be a robust approach to making an appropriate allowance for the number of housing completions that could reasonably be anticipated to be provided on currently non-effective sites, but which could be expected to become effective. For sites which already have annual programming set out in the 2019 housing land audit, I support the suggested approach of carrying forward that programming of annual completion rates across the full plan period to 2031, or until the site's capacity would be reached.

45. Homes for Scotland and others contend that those sites that are currently constrained, and which have no programmed completions in the 2019 housing land audit, should be assumed to remain constrained and not provide any completions during the

plan period. This is clearly in marked contrast to the council's position, which assumes all of these units will be completed by 2029.

46. From my experience I would expect these constrained sites to make some contribution to housing completions during the plan period to 2029, and during the extrapolated period to 2031. However, there is no evidence before me upon which I could justifiably base a specific percentage allowance for housing completions on such sites; to do so would be entirely arbitrary. In these circumstances, I consider the most transparent approach would be to separate out these sites as part of the land supply calculation, and apply a range so that the calculation is made assuming both a zero contribution (as suggested in representations) up to a 100% contribution (as used by the council). This has the advantage of illustrating the two extremes, whilst at the same time enabling the calculation to show whether the contribution from such sites would be needed in any event. If it is, it puts me in a better position to make a judgement on the extent to which any shortfall could reasonably be expected to be met by currently constrained sites.

Demolitions

47. Representations have highlighted that the council's calculation of its land supply, relative to the housing land requirements, fails to take account of completed or planned demolitions. Moreover, it has been shown in representations that the number of planned demolitions is significant, and that these were not accounted for when the housing land requirements were set by Clydeplan.

48. When the Clydeplan housing land requirements were being set, including those for North Lanarkshire and its housing sub-market areas, that process included a mechanism which enabled planned demolitions to be accounted for, where judged to be appropriate.

49. It is clear that at that time, no account was taken of the now planned demolition of tower blocks, which form part of the existing social housing stock. Nor does it appear that demolitions, including some private tenure homes, as a part of the 'Cumbernauld Multi Storey Flats Re-Provisioning Project' were taken into account. However, it is not for this examination to surmise what impact this may have had on the setting of the housing supply targets and housing land requirements, had these planned demolitions been known at that time. It cannot be assumed that these would have been increased by a corresponding amount (or even at all), had the full extent of now planned demolitions been known.

50. Clydeplan has set the housing land requirements applicable to the proposed plan having applied a mechanism to account for (or at least to have regard to the implications of) planned demolitions. Regardless of whether or not that approach was informed by up-to-date information, and regardless of whether planned demolitions have subsequently increased since Clydeplan was adopted, I do not consider it appropriate to bring a matter back into play in this local development plan examination that has explicitly already formed part of Clydeplan's formulation. The setting of housing land requirements is for the strategic development plan and it is not for the local development plan process to make subsequent adjustments to this. In my view it makes no difference whether such adjustments would be to alter the housing land requirements or deduct demolitions from the established supply, as the ultimate effect would be the same; more land would be required to be identified over and above that required by the Clydeplan housing land requirements.

51. I agree with the council that it is for the proposed plan to make provision to meet Clydeplan's housing land requirements. As the Court of Session judgement for MacTaggart & Mickel Homes Limited and others v Inverclyde Council and Scottish Ministers (2020) confirmed, there is no scope for housing land requirements to be subsequently adjusted in a local development plan. I find no basis to deviate from that position, particularly as Clydeplan was only adopted in 2017.

52. There are a number of other reasons why I find that deducting total planned demolitions from the established supply would also be inappropriate in this case. First, whilst the number of planned demolitions as part of the council's Towers Strategy is substantial (potentially around 1,750 flatted dwellings from the demolition of 14 tower blocks by 2024, and 4,650 by 2042), it is apparent from the council's submissions that its replacement programme accounts for existing vacant properties, not only within the earmarked tower blocks but also through bringing empty homes in the wider housing stock back into use. If demolitions were deducted from the established housing land supply, any resultant or increased shortfalls against the housing land requirements would fail to reflect the true nature of the social housing stock and the council's regeneration delivery plan.

53. Linked to this, if demolitions were accounted for in the supply calculation and if this triggered the need to allocate further housing land in the proposed plan, the resultant developments on additional land would be unlikely to provide replacement social housing. It does not logically follow that further housing land allocations should be provided almost exclusively in response to anticipated social housing demolitions, unless any such land would also principally be for replacement social housing.

54. The council has provided a broad indication of the timeline for providing replacement social housing alongside demolitions. Given this extends beyond 2031 (the end of the proposed plan period), and keeping in mind that funding is often a determining factor in the pace at which social housing schemes can progress, I do not find that accounting for demolitions through this examination would offer any benefits or assistance to the delivery of the council's programme.

55. Whilst the housing land requirements in Clydeplan are minimum rather than maximum figures, given the scale of demolitions planned, adjusting the residual housing land requirements or allocating more land to account for demolitions could have significant strategic and spatial planning implications which cannot appropriately be accommodated at this stage. In my view, this is a matter which would be more appropriate to revisit, if necessary, in the setting of future housing land requirements for North Lanarkshire. This would allow for any wider and longer term implications of the council's Towers Strategy to be more fully understood, and accounted for insofar as may be appropriate. The proposed plan meanwhile must be focused on achieving the housing land requirements set by Clydeplan as they currently stand; it is on this basis that the proposed plan has been formulated. Importantly, public participation has been based on an overarching understanding that the quantum of new housing development required has already been prescribed.

56. Representations have referred me to paragraph 53 of PAN 2/2010 as confirmation that demolitions need to be accounted for and housing land requirements relate to net new supply. I do not share this interpretation of PAN 2/2010; the relevant sentence of paragraph 53 simply states that in housing land audits, "Completions on regeneration sites should be shown net of any demolitions which have taken place." It is not an

instruction that demolitions must be accounted for more widely as part of the overall supply calculation, but relates instead to regeneration sites specifically where demolitions and new builds are taking place on the same site. The housing land audits should therefore already be accounting for demolitions and the net difference in units where redevelopment is taking place on the same site. My attention has not been drawn to any other requirements in policy or guidance for demolitions outwith this specific circumstance to be deducted from the land supply.

57. I acknowledge that there are examples of where demolitions have been taken into account in local development plan examinations. Nevertheless, it is ultimately a matter of judgement rather than a requirement of policy or law. In this case, for the reasons outlined above it is my judgement that the proposed plan is neither inappropriate nor insufficient by virtue of its approach that does not account for demolitions of existing housing stock to date, or planned demolitions, in its land supply calculations.

Housing land supply conclusions

58. Taking all of the foregoing into account, the tables below outline what I find to be the current housing land supply position for the purposes of this examination, against each of the relevant housing land requirements specified by Clydeplan.

All tenure, North Lanarkshire					
Plan period	**2012 - 2024**	**2024 - 2029**	**2012 – 2029**	**2029 – 2031**	**2012 - 2031**
HLR	14,630	6,100	20,730	2,439	23,169
Completions 2012 - 2019	6,950		6,950		6,950
Residual HLR	7,680	6,100	13,780	2,439	16,219
Effective/programmed supply 2019 – 2026 (HLA 2019)	9,100	3,382	12,482		12,482
Programmed sites (HLA 2019), extrapolated for 2026 onwards		2,404	2,404	742	3,146
Contribution from currently constrained sites, expected to become effective (range)	0	0 – 3,913	0 – 3,913	0 (to avoid double-counting of the 3,913)	0 – 3,913
Total supply (range)	9,100	5,786 – 9,699	14,886 – 18,799	742	15,628 – 19,541
Surplus(+)/ shortfall(-) in established supply	+1,420	Between -314 and +3,599	Between +1,106 and +5,019	-1,697	Between -591 and +3,322

Private, Cumbernauld HSMA					
Plan period	**2012 - 2024**	**2024 - 2029**	**2012 – 2029**	**2029 – 2031**	**2012 - 2031**
HLR	2,900	1,210	4,110	484	4,594
Completions 2012 - 2019	1,854		1,854		1,854
Residual HLR	1,046	1,210	2,256	484	2,740
Effective/programmed supply 2019 – 2026 (HLA 2019)	2,066	880	2,946		2,946
Programmed sites (HLA 2019), extrapolated for 2026 onwards		602	602	219	821
Contribution from currently constrained sites, expected to become effective (range)	0	0 - 547	0 - 547	0 (to avoid double-counting of the 547	0 - 547
Total supply (range)	2,066	1,482 – 2,029	3,548 – 4,095	219	3,767 – 4,314
Surplus(+)/ shortfall(-) in established supply	+1,020	Between +272 and +819	Between +1,292 and +1,839	-265	Between +1,027 and +1,574

Private, Airdrie and Coatbridge HSMA					
Plan period	**2012 - 2024**	**2024 - 2029**	**2012 – 2029**	**2029 – 2031**	**2012 - 2031**
HLR	4,060	1,690	5,750	676	6,426
Completions 2012 - 2019	1,488		1,488		1,488
Residual HLR	2,572	1,690	4,262	676	4,938
Effective/programmed supply 2019 – 2026 (HLA 2019)	1,768	559	2,327		2,327
Programmed sites (HLA 2019), extrapolated for 2026 onwards		735	735	195	930
Contribution from currently constrained sites, expected to become effective (range)	0	0 - 647	0 – 647	0 (to avoid double-counting of the 647)	0 – 647
Total supply (range)	1,768	1,294 – 1,941	3,062 – 3,709	195	3,257 – 3,904
Surplus(+)/ shortfall(-) in established supply	-804	Between -396 and +251	Between -1,200 and -553	-481	Between -1,681 and -1,034

Private, Motherwell HSMA					
Plan period	**2012 - 2024**	**2024 - 2029**	**2012 – 2029**	**2029 – 2031**	**2012 - 2031**
HLR	4,640	1,930	6,570	772	7,342
Completions 2012 - 2019	2,330		2,330		2,330
Residual HLR	2,310	1,930	4,240	772	5,012
Effective/programmed supply 2019 – 2026 (HLA 2019)	2,385	1,388	3,773		3,773
Programmed sites (HLA 2019), extrapolated for 2026 onwards		1,004	1,004	328	1,332
Contribution from currently constrained sites, expected to become effective (range)	0	0 – 2,330	0 – 2,330	0 (to avoid double-counting of the 2,330)	0 – 2,330
Total supply (range)	2,385	2,392 – 4,722	4,777 – 7,107	328	5,105 – 7,435
Surplus(+)/ shortfall(-) in established supply	+75	Between +462 and +2,792	Between +537 and +2,867	-444	Between +93 and +2,423

Private, North Lanarkshire					
Plan period	**2012 - 2024**	**2024 - 2029**	**2012 – 2029**	**2029 – 2031**	**2012 - 2031**
Private, North Lanarkshire HLR	11,590	4,830	16,420	1,932	18,352
Completions 2012 - 2019	5,672		5,672		5,672
Residual HLR	5,918	4,830	10,748	1,932	12,680
Effective/programmed supply 2019 – 2026 (HLA 2019)	6,219	2,827	9,046		9,046
Programmed sites (HLA 2019), extrapolated for 2026 onwards		2,341	2,341	742	3,083
Contribution from currently constrained sites, expected to become effective (range)	0	0 – 3,524	0 – 3,524	0 (to avoid double-counting of the 3,524)	0 – 3,524
Total supply (range)	6,219	5,168 – 8,692	11,387 – 14,911	742	12,129 – 15,653
Surplus(+)/ shortfall(-) in established supply	+301	Between +338 and +3,862	Between +639 and +4,163	-1,190	Between -551 and +2,973

59. The tables above show that in most instances, even if it is assumed that currently constrained sites would make a zero contribution to completions, there would still be a sufficient established housing land supply to meet the housing land requirements for both plan periods set by Clydeplan, and also to meet the additional notional requirements extrapolated to 2031.

60. In the Airdrie and Coatbridge housing sub-market area, there is an identified shortfall in housing land to meet the private housing land requirement to 2024 and 2029, as set by Clydeplan. The extrapolation of the housing land requirement to 2031 further exacerbates this shortfall. For this reason, in this particular housing sub-market area there is justification for further suitable housing sites to be considered for allocation through this examination, as the plan has identified insufficient land to meet the housing land requirement in this area.

61. The scale of the shortfall in the Airdrie and Coatbridge housing sub-market area inevitably has a knock-on effect on the land supply available to meet the North Lanarkshire-wide housing land requirements. For private tenure homes, this manifests itself as a potential shortfall only when the extrapolated period to 2031 is taken into account; there is no indication that there would be a housing land shortfall to meet the authority-wide private housing land requirement set by Clydeplan to 2029.

62. Given the plan is obligated to make provisions to meet the Clydeplan housing land requirements, where a shortfall would arise only in the extrapolated period I consider that much greater caution is needed in any consideration of further land release. In this instance, I note that that if currently constrained sites were to ultimately contribute in the region of at least 551 private tenure housing completions between 2024 and 2031 (out of a total constrained capacity of 2,943), there would not be a shortfall over the full period to 2031. This would represent approximately 19% of the constrained supply becoming effective and being completed, which does not strike me as eminently unachievable or optimistic.

63. There is also the potential for a modest shortfall (314 units) in the all-tenure housing land requirement for North Lanarkshire, for the period 2024 – 2029. However, this would potentially be addressed if around 9% of the total constrained supply became effective and delivered completions by 2029. Again, whilst there are some inherent uncertainties, in the context that sites that are expected to become effective are permitted by Scottish Planning Policy to contribute to meeting the housing land requirement, I do not consider this places excessive reliance upon currently constrained sites, and my confidence that this is achievable is sufficient for me to conclude that there is no need to allocate additional sites more widely across North Lanarkshire.

64. I have also previously noted in my conclusions above that caution should be exercised if only marginal surplus housing land relative to any of the housing land requirements was identified. This was in recognition that there has been a trend of programming being higher than actual completions, to varying extents. In this context, I note that for private tenure homes in the Motherwell housing sub-market area, for the period to 2024 the surplus is calculated to be in the region of only 75 homes.

65. Notwithstanding that the surplus is relatively marginal to 2024, in the period to 2029 the surplus housing land supply increases. If more sites were to be allocated to further bolster the effective supply to 2024, I am also doubtful as to whether these would be capable of making a meaningful contribution to completions. It is unlikely that the

proposed plan will be adopted until at least mid-2021. It is likely to be challenging for these sites to then obtain planning permission (which may also require a legal agreement), to be in a position to break ground and then deliver completions by 2024. In conclusion, I do not consider allocating more land to bolster the supply in the Motherwell housing sub-market area is currently necessary or justified.

66. All told and in conclusion, the above calculations indicate that the proposed plan has identified insufficient housing land to meet the private tenure housing land requirement in the Airdrie and Coatbridge housing sub-market area. I am satisfied that in relation to all other housing land requirements, sufficient land that is effective or expected to become effective is currently identified.

67. In response to the specific identified shortfall in the Airdrie and Coatbridge housing sub-market area, it is necessary for us to explore whether there are other suitable housing sites being promoted and which would be appropriate to be allocated in the local development plan.

68. It has been asserted in a representation that during the examination of Clydeplan, the Clydeplan Strategic Development Planning Authority confirmed that where a housing land requirement for a particular housing sub-market area would not be met, additional housing sites could be allocated in any housing sub-market area to address the shortfall.

69. Whilst I have no reason to doubt this assertion, this approach has not ultimately been captured by Clydeplan's policy wording, which provides no indication that shortfalls in one sub-market area may be addressed in other sub-market areas. I consider the adequacy of the land supply must be assessed, and any shortfalls addressed, within the physical extent of each sub-market area, without allowing for unplanned release of land for housing in other sub-market areas which themselves have a sufficient housing land supply.

70. Policy 8 of Clydeplan provides specific criteria which apply in the event of any shortfalls in the five-year supply of effective housing land. The first criterion is that "the development will help to remedy the shortfall which has been identified". In my judgement, this strongly implies that a shortfall in one sub-market area would not justify the release of land for housing elsewhere.

71. Our focus on considering opportunities to make further housing land allocations has therefore been confined to sites within the Airdrie and Coatbridge housing sub-market area. In addition, I have given consideration to whether the proposed plan provides an appropriate policy framework to enable sustainable land release in the event of a shortfall against the required minimum five years effective housing land supply being identified.

Policy PROM LOC3

72. Objections have been raised in representations to the proposed policy approach that would apply in the event of there being less than the required minimum 5-year effective housing land supply.

73. In such circumstances, the first step proposed in policy PROM LOC3 would be to "direct development towards sites considered non-effective…". The council has asserted that there would be no value in having a wider range of sites that are not currently effective, if they cannot be called upon in such circumstances.

74. The purpose of identifying a suitably generous supply of sites is to ensure that the housing land requirement for the plan period as a whole can be met, which in turn is to ensure the housing supply target can be achieved. There is no expectation for all sites to be effective at the point of adoption, but by identifying sufficient sites which are expected to become effective during the plan period, this should provide a pipeline of sites which will over time become effective. This enables the minimum 5-year effective supply of housing land to be maintained at all times.

75. Housing land audits (HLAs), through their annual updates, should be capable of identifying when sites in the established supply are anticipated to become effective. In some instances, I recognise that there may be some delay in this transition being captured by the HLA, and in any event HLAs are not infallible. However, I do not consider that the limitations of HLAs would justify a policy approach which would essentially require non-effective sites to become effective as and when the effective supply needs to be increased.

76. If a site is identified as 'non-effective' (whether in full or in part) in the most recent HLA, by definition the non-effective component has been assessed as currently being incapable of contributing to the housing land supply in the next five years. I can see no practical means by which the council could apply this aspect of policy PROM LOC3 so that it could reasonably rely on non-effective sites becoming effective, as a matter of course. I therefore consider a modification to this aspect of the policy is necessary.

77. It has also been asserted in representations that the policy's proposed sequential approach to the release of additional (non-allocated) sites, in the event of an effective housing land shortfall, is inappropriate because it could not be applied in practice.

78. In normal circumstances, the development plan guides development to appropriate locations, through a combination of policies and site-specific proposals and allocations. However, if a shortfall in the 5-year effective housing land supply has arisen, that in itself represents a specific failure in the plan-led system, and any policy provisions which are intended to rectify this situation must be fit for purpose. This means that any such provisions must in principle enable, rather than resist, housing proposals where it would be sustainable development, in order to restore an adequate effective housing land supply.

79. Whilst I recognise the council's rationale for seeking to apply a sequential approach to further housing land release, this would present some obvious practical challenges. Unlike during the production of a development plan, where all site options can be considered holistically as part of a wider spatial strategy, and when sequential locational preferences can easily be applied, this approach would not lend itself well to the development management process. If there is a shortfall in the effective housing land supply, the policy as drafted would ostensibly require the decision-maker to consider all options for development on sequentially preferable sites before potentially approving a proposal. However, any such exercise would be meaningless unless there were also current, or at least imminent, planning applications on all of these other sequentially preferable sites, which could offer genuine alternatives (and depending on the size of the shortfall) to the sequentially less preferable site(s). This would be extremely unlikely.

80. It may be entirely possible to identify sequentially preferable alternative sites, but in the absence of detailed proposals for their development, this would be an idealistic, hypothetical assessment which would be unlikely to achieve the principal aim of this part

of the policy, which is to address an identified effective housing land shortfall.

81. That is not to say that locational principles should be disregarded in such circumstances. Paragraph 125 of Scottish Planning Policy (as amended in December 2020) acknowledges that proposals which do not accord with the development plan should not be considered acceptable unless material considerations indicate otherwise. SPP also identifies an effective housing land shortfall as a material consideration in favour of housing proposals, with the final sentence of paragraph 125 advising that "Whether a proposed development is sustainable development should be assessed according to the principles set out in paragraph 29."

82. All told, given that a shortfall in the required effective housing land supply would represent a specific failure of the development plan, the policy response to address the situation cannot follow the same course as in normal circumstances, if the plan is to facilitate the release and development of additional housing land. For the reasons outlined above I consider the sequential approach proposed in policy PROM LOC3 is unduly restrictive, and impractical to meaningfully implement in practice.

83. Policy 8 of Clydeplan (the adopted Strategic Development Plan) already contains criteria to be applied should a shortfall in the five-year supply of effective housing land arise in any of its constituent local authority and/or housing sub-market areas. It states that:

"Local Authorities should take steps to remedy any shortfalls in the five-year supply of effective housing land through the granting of planning permission for housing developments, on greenfield or brownfield sites, subject to satisfying each of the following criteria:

- the development will help to remedy the shortfall which has been identified;
- the development will contribute to sustainable development;
- the development will be in keeping with the character of the settlement and the local area;
- the development will not undermine Green Belt objectives; and,
- any additional infrastructure required as a result of the development is either committed or to be funded by the developer."

84. Clydeplan's approach to addressing any shortfall clearly does not therefore allow unsustainable or otherwise inappropriate development, but it does reflect the need to relax the full range of locational principles and requirements which would otherwise apply. I therefore consider it appropriate for LDP policy PROM LOC 3 to align with this approach rather than deviating from it with a more onerous sequential approach.

85. Alternative wording for policy PROM LOC3 has been proposed in representations, which also generally aligns with Policy 8 of Clydeplan. These suggested policy revisions also include wording to clarify that SPP's presumption in favour of development that contributes to sustainable development will be a significant material consideration in such circumstances. It is however important to note that the December 2020 amendments to SPP removed the previous direct link between an effective housing land shortfall and the engagement of the presumption as a significant material consideration. It would no longer be consistent with SPP (as amended) to include such a statement in the policy.

86. The SPP amendment is subject to judicial review, which is capable of being a

material consideration. However, my recommended modifications to policy PROM LOC3 align with Clydeplan wording, which was produced in the context of the original wording of SPP 2014. I am satisfied that my recommended modification to the policy would be appropriate, regardless of the ultimate outcome of the judicial review.

87. As already discussed above, I do not agree it would necessarily be appropriate to allow housing development across the local authority area (as suggested in representations), if a shortfall only related to a particular housing sub-market area. In such circumstances, the release of additional housing land outwith the applicable sub-market area would do nothing to address the identified shortfall.

88. Aside from the above, I consider the revised policy wording suggested in representations to be broadly appropriate with some reordering and revisions to improve clarity. Accordingly, I recommend a modification to address the deficiencies to the policy as currently worded. In issue 1 I have recommended that all 'policy' and related 'guidance' sections should be merged together to form single, expanded policies. The modification outlined below reflects this.

89. A representation has sought a modification to the policy, so that site capacities should be considered to be a minimum amount, which could be increased in order to address or avoid shortfalls in effective housing land. I consider such a change would be problematic, as it is often impossible to specify the exact number of homes which could be accommodated on a site, until a detailed layout and house types have been considered. This is why site capacities are better treated as indicative, and the precise number of units may ultimately be higher or lower, depending on a wide range of considerations. If site capacities were treated as minimum figures, this could lead to difficulties if it ultimately became apparent that a satisfactory development could not be achieved at this minimum density. It could also encourage under-estimations of site capacities in the future, in order to account for any such potential difficulties in meeting the specified figure. I do not find this suggested modification would be appropriate for these reasons.

90. The modification to PROM LOC3 ought to facilitate the bringing forward of appropriate non-allocated sites, should a shortfall in the five year effective housing land supply arise, calculated against the applicable housing land requirements. In addition to exploring the opportunity for further housing land allocations in Airdrie and Coatbridge housing sub-market area, this is another aspect of how we have sought to address the potential implications of any emerging shortfalls by ensuring an appropriate and sufficient policy mechanism is contained within the plan.

<u>Appendix – Housing Land Requirements</u>

91. In issue 1, the council has referred to various representations which challenge the accuracy and appropriateness of the calculations set out in the appendix on pages 138 – 143 of the proposed plan. The appropriateness of the calculations set out in the appendix also goes to the heart of a number of representations which have been considered under issue 4 in this schedule 4. In these representations, a range of different modifications are sought to this appendix.

92. On pages 139 to 143 of the modified proposed plan, the council has attempted to explain how the applicable housing land requirements have been derived, followed by the presentation of a range of different methodologies for calculating whether the plan has

identified sufficient housing land to meet these housing land requirements.

93. I can appreciate why this appendix has given rise to the confusion and concern expressed in representations. By setting out a range of methodologies for calculating the sufficiency of housing land identified by the plan, this creates an inherent lack of clarity over what approach should be favoured and what conclusions can be drawn from this in regard to the housing land supply situation.

94. Given that above I have set out calculations of the housing land supply situation based on a detailed assessment of the evidence before me, I find a modification is necessary to replace the multiple methodologies with a single set of calculations relating to each of the applicable Clydeplan housing land requirements. This would eliminate the confusion caused by illustrating multiple methodologies, which I find to be inappropriate. The figures in the tables in my recommended modifications differ slightly from the figures presented in my conclusions above. This is because they take account of site-specific modifications. I have also sought to consolidate figures to avoid unnecessary detail and complexity being presented in the plan.

95. I also find that the explanation of the steps taken in setting the housing land requirements, on page 139, unnecessarily complicates what should be a straightforward description of what is required of the local development plan. In simplest terms this is to identify sufficient land to meet the all-tenure and private tenure housing land requirements for North Lanarkshire, and the private tenure housing land requirements for each of the three housing sub-market areas, all of which are prescribed by Clydeplan.

96. By providing a summary of all of the steps which influenced the setting of the Clydeplan housing land requirements (together with figures), this detracts from what should be the focus of the local development plan. I find the deletion of this part of the appendix, as requested in representations, would address this problem. As part of this modification, some consequential amendments to the text on page 138 are also recommended. For ease of reference therefore, I have presented a complete replacement appendix in my recommendations below. This also takes account of other modifications, such as the need to reflect the full plan period to 2031, but I have not reviewed the overall soundness of the wording on page 138 where this has not been referred to in representations.

97. A representation has sought some minor changes to terminology, so that private and social housing is referred to as market and affordable housing, consistent with paragraph 115 of Scottish Planning Policy. However, given the overriding emphasis of modifications to the appendix are to ensure that what is presented is consistent with Clydeplan, it is relevant to note that Clydeplan does refer to private and social tenure. This difference from SPP terminology, and the reasons for it, are explained in paragraph 6.44 of Clydeplan. I am therefore content that the reference to private and social housing is an appropriate choice of terminology.

<u>Appendix – Housing land audit 2017</u>

98. As I have concluded that the proposed plan should more appropriately rely on the 2019 housing land audit, the list of sites identified in the appendix on page 144 onwards must be amended. Accordingly, I recommend a modification to require necessary consequential amendments to this appendix.

Site selection methodology

99. The council's approach to site selection has been criticised in representations, principally because of an alleged lack of transparency in how sites have been assessed and selected. It has also been asserted that site effectiveness has not been properly established.

100. The council has submitted its 'Site Selection Methodology Background Report' (dated November 2018), which provides an overview of the four-stage approach it has applied to site selection. I also issued a further information request to the council, which sought various points of clarification so that I could fully understand the approach it had followed.

101. Stage 1 of the site selection methodology automatically rolled forward a wide range of existing housing land allocations from the North Lanarkshire Local Plan, which remains extant until it is replaced by the proposed plan. Concerns have been raised that by omitting any form of assessment of these sites, their ongoing suitability and effectiveness has not been established, contrary to paragraph 123 of Scottish Planning Policy.

102. Given these sites have been subject to a robust assessment of suitability, and the principle of development has been established though the local plan's formulation and examination, I do not consider it was inappropriate for the council to continue to recognise them as suitable allocations at this time. I note that a caveat was placed on this automatic inclusion of existing allocated sites which meant that if there had been a material change in the status of a site, it would be subject to reassessment.

103. In regard to re-assessing effectiveness of allocations, I note that Scottish Planning Policy paragraph 123 places the onus firmly on the housing land audit process as the means to critically review the supply of land and its effectiveness. As all of the sites allocated in the local plan are captured by the housing land audit, I do not consider that it was necessary to make a separate assessment of existing site effectiveness as part of the proposed plan's site selection process.

104. Stage 2 of the site selection methodology removed a substantial number of sites that had been suggested/promoted for allocation at the Call for Sites and Main Issues Report stages of plan preparation, depending on their general location. Sites in a number of wards were excluded from the process principally because the Housing Need and Demand Assessment (HNDA) (which also informed Clydeplan) did not identify any need for additional housing in these areas.

105. The council's use of wards, and its reference to the HNDA, has potentially caused some confusion over how it has selected sites and whether or not this approach was appropriate. The reference to wards was intended to assist in the wider understanding of where additional housing would and would not be required. I acknowledge the council's point that outside of the planning profession, there is unlikely to be an understanding of the geography of 'housing sub-market areas', and reference to specific wards may have been beneficial in regard to public participation. The opportunity for confusion arises however because the housing land requirements set by Clydeplan apply to housing sub-market areas (and authority-wide); ward-level requirements do not feature.

106. The council has clarified that the electoral wards it grouped together, to rule in or out sites for further assessment, were aligned with housing-sub-market areas, and

reference to wards was an 'explanatory tool' to assist communities to engage more effectively with the process. Whilst it may not have been immediately obvious from the way in which the information was presented, I am satisfied that the council's approach was based on the appropriate housing sub-market area scale, rather than considering the need for allocations at individual ward level. In this regard the approach did therefore align with the geographical scales and requirements applied by Clydeplan.

107. I consider that stage 2 of site selection did deviate from the correct process, by determining where additional housing land was needed based on the HNDA. It is not for the proposed plan to directly apply the HNDA findings; this is part of the evidence base which informs the setting of the housing supply targets and housing land requirements, which is the role of the strategic development plan. As paragraph 115 of Scottish Planning Policy makes clear, "The housing supply target is a policy view of the number of homes the authority has agreed will be delivered in each housing market area over the periods of the development plan and local housing strategy, taking into account wider economic, social and environmental factors, issues of capacity, resource and deliverability, and other important requirements…". This makes clear that it is not the findings of the HNDA which dictate the amount of new housing required in North Lanarkshire and it housing sub-market areas, it is the housing supply targets and housing land requirements stipulated by Clydeplan.

108. Ruling out the need for further housing land in certain housing sub-market areas based on evidence in the HNDA, rather than the policy view of where housing should be provided as reflected in the Clydeplan housing land requirements, runs a clear risk of ruling out potential sites in areas where additional housing land is in fact needed. Ultimately however, albeit perhaps fortuitously, the council's identification of a shortfall only in the Airdrie and Coatbridge housing sub-market area aligns with my own conclusions on the current housing land supply situation. This means that additional sites which could potentially make a contribution to this shortfall have all been subject to detailed further assessment.

109. I note the point raised in representations that this approach would have potentially prevented the allocation of otherwise suitable sites, had the need arisen to identify additional land in other housing sub-market areas, or across North Lanarkshire as a whole. I agree that this approach introduced considerable risk in this regard, which could have also become a significant impediment to the options available as part of the examination, had any wider housing land shortfalls emerged.

110. As it stands however, there is currently no imperative to identify additional land other than in the Airdrie and Coatbridge housing sub-market area, where site assessments have been undertaken by the council. Housing land release must be driven by the housing land requirements, and I do not find the plan to be deficient on the basis of it not allocating additional land where demand may exist, but where there is already sufficient land to meet the applicable housing land requirement(s).

111. Stages 3 and 4 of the council's site selection methodology identified a wide range of factors, set out in 'site sustainability and deliverability' matrices. Here, the council has attributed scores to each site under the headings 'social capital', 'economic capital' and 'natural capital'. I agree with the council that these have parallels with the concept of sustainability which is typically considered in terms of social, economic and environmental implications. I find no reason to conclude that the breadth of considerations applied by the council was not sufficient to properly consider the potential suitability of sites for

housing.

112. The outcome of the council's site assessment has deliberately been influenced by attaching greater weight to social capital findings than to the matters covered under the economic and natural capital categories. Indeed where sites failed to score high enough under the social capital category, they would be ruled out of contention without any further assessment to consider the potential benefits and disbenefits of the sites for housing more holistically.

113. Whilst arguments can be made for and against this approach, it was for the council to determine the relative weight it intended to apply to the matters identified in the matrices. Inevitably, different weightings could yield different results, but this does not invalidate the council's approach.

114. Concerns have been raised that as the council has used what seems to be a formulaic approach to site selection, there is a lack of consistency and clarity over which sites have ultimately been proposed for allocation, and which have not. Whilst I recognise the basis of these concerns, I am reassured that professional judgement has been applied, rather than an over-reliance on a site's 'score'.

115. The scores under each category of the matrices are essentially a figurative representation of the professional judgment applied to each consideration. If taken purely at face value the scoring approach would appear to be a somewhat crude means of making decisions on whether or not to allocate a site, but I am satisfied that there has not been undue reliance on scoring in site selection. Whilst there are instances of a lack of clarity over why a site may ultimately have been selected or rejected and how the site compared to other options, this appears to be a deficiency in the explanatory narrative provided by the council rather than an inherent deficiency in the site selection methodology more widely.

116. In regard to whether the council's site selection methodology has given adequate consideration to site effectiveness, although the matrices do not refer to the same tests of effectiveness as they appear in paragraph 55 of PAN 2/2010, I consider that the categories which have been applied provide sufficient opportunity for the same potential constraints to development / site effectiveness to be identified. Considerations such as physical constraints, contamination, infrastructure and land use have all been captured by the matrices.

117. There appears to have been less detailed consideration of site marketability and any potential deficit funding. I note it has been considered briefly under 'deliverability' in a small number of cases. The marketability of sites is not static in any case, and there are many influences which can make locations more or less marketable over time. Similarly, funding constraints can often be overcome rapidly, once budgets and priorities are set. I do not find it inappropriate that these matters have not had a strong bearing on site selection. In terms of ownership, sites have generally been promoted for allocation by or on behalf of landowners, which provides sufficient grounds to consider a site available for development planning purposes.

118. In any event, the tests of effectiveness outlined in PAN 2/2010 relate to how sites within housing land audits should be assessed. The same tests do not directly apply to site allocations, which are not required to be effective at the outset as long as they are expected to be capable of becoming effective during the plan period (as outlined in

paragraph 117 of Scottish Planning Policy).

119. In conclusion, I find the proposed plan's housing allocations have been informed by a sufficient site selection methodology. The focus of the examination must anyway be on the appropriateness and the sufficiency of the proposed plan, and not the steps taken in producing it. With this in mind, the site selection process used by the council has not identified sufficient land to meet the housing land requirement for private tenure homes in the Airdrie and Coatbridge housing sub-market area. We have therefore had regard to the council's matrices for non-allocated sites alongside other evidence before us, including in representations and supporting documents, to explore whether additional sites could appropriately be allocated in this specific sub-market area.

Noise guidance – implications for site effectiveness

120. Representations assert that the council is applying noise guidance which is of a nature that undermines site effectiveness. We have considered the proposed plan's relationship with the noise guidance in issue 2, where we have recommended modifications to clarify that statutory supplementary guidance on noise is required. I am satisfied that this approach, rather than ongoing reliance on non-statutory noise guidance, would ensure that the approach to noise, including compatibility of uses and required mitigation, would be consistent with national and local policy, and so would not unduly constrain development on otherwise effective sites.

Part 2

Objections to existing housing development sites

Gartcosh/Glenboig Community Growth Area (sites NLSK0442A and NLMK0442B)

121. The representations made by the Gartcosh Tenants & Residents Association raise matters specific to site NLSK0442A. Wider concerns raised in relation to the scale of development planned at Gartcosh more generally are considered in issue 31.

122. The council has confirmed that planning permission in principle was granted on 12 March 2021 for the development of site NLSK0442A. Consequently, I find that the allocation is appropriate as it reflects the fact that the site now has planning permission. No modification is required.

123. Representation 265 relates specifically to site NLMK0442B at Glenburn Gardens. The council has confirmed that planning permission was granted for the site's development on 17 September 2020. Consequently and as above, I find that the allocation is appropriate as it reflects the fact that the site has planning permission. No modification is required.

Bartonhall Road and Burnhall Place, Waterloo (site NLMW1266)

124. Objections to this allocation refer to the number of homes being excessive for the size of the site; its positon next to Greenhead Moss nature reserve; its open character and use as a children's play area.

125. On 11 March 2021, the council informed us that planning permission for 20 homes was approved subject to conditions on 18 November 2019. With this in mind, the

principle of residential development has already been established and there would be no benefit in me considering the objections to this site's allocation in this context.

126. I find that the allocation is appropriate as it reflects the fact that the site has planning permission. No modification is required.

Former Bargeddie Primary School, Coatbridge Road, Bargeddie (site NLMK0533)

127. The site has planning permission for residential development. An objection to the site has been made but I agree with the council that these are matters which are relevant to the development management process. As it stands, the principle of housing development on the site is established and therefore its ongoing allocation is appropriate. No modification is required.

Northern Corridor sites

128. A representation has raised objections to the quantum of development on existing housing sites in the Northern Corridor, and has requested that no further housing be built until an impact assessment has been conducted. The representation also asserts that no further housing land at Stepps should be identified.

129. We have had regard to the matters raised in this representation in issue 31, which is focused on the Northern Corridor Local Area Partnership. Issue 31 relates more directly to the generalities and principle of development in the Northern Corridor as a whole. Here in part 2 of my issue 4 conclusions, I have only addressed matters raised in site-specific representations.

Objections to proposed housing development sites

Land west of Morningside, Newmains (site 20/19)

130. Representations relating to this site are considered in issue 33, which specifically relates to the site's proposed allocation.

Land at High Street, Newarthill (site 06/17 P)

131. Representations relating to this site are considered in issue 34, which specifically relates to the site's proposed allocation, including both objections to it and a request to extend the site area.

Land at Coatbridge/Langmuir Road, Bargeddie (site 02/09)

132. Representations relating to this site are considered in issue 35, which specifically relates to the site's proposed allocation.

Land at Stirling Road/Greengairs Road, Stand (site 01/07 P)

133. A representation has raised objections to this site's allocation, noting its nature conservation interest and apparent inconsistencies in how the council has applied its site sustainability and deliverability matrix to this site.

134. Whilst I note these concerns, it is of significance that planning permission was

granted for the development of this site on 29 September 2020, as confirmed by the council. This has established the principle of the site's development, and it is therefore appropriate for the plan to reflect this decision. The removal of the allocation would have no bearing on the planning permission which now exists. In order to ensure that the plan provides sufficient clarity over where development is anticipated to come forward, I find the allocation to be justified.

135. The site's promoter has made a representation relating to stated site capacities being considered as a minimum figure. I have dealt with the substance of the representation under the policy PROM LOC3 subheading. However, I note this site is referred to specifically, and in this case the planning permission is for 523 units, which substantially exceeds the indicative capacity of 300 units stated in the proposed plan. I therefore recommend a modification to the site's capacity as stated in the plan to reflect the planning permission.

136. This modification has no bearing on my land supply findings in part 1 above, as I note that the 2019 housing land audit identified the site's capacity as 523, already reflecting the terms of the planning permission.

Land west of Bellshill Road, Uddingston (site 02/13)

137. The representation seeks the identification of this site as a housing allocation, rather than as a regeneration site, to which policy PROM LOC1 would apply. The objection is based on the concern that if the site is not recognised specifically as a housing site, this could present barriers to obtaining planning permission for this purpose.

138. I note that the council is minded to grant planning permission in principle for residential development on the site, subject to the conclusion of a legal agreement. Therefore, the principle of housing on the site has been accepted.

139. A specific housing allocation would more directly reflect the current proposal. However, I do not find the regeneration site allocation to be an impediment to the progression of the current or an alternative housing proposal. I agree with the council that the 'regeneration site' status would provide greater flexibility and scope to consider a wider range and/or mix of uses on the site. As the council wants to see this site regenerated by development, and as this could be achieved through a variety of development types and uses, I see no reason at this stage to stipulate that only housing would be permissible, particularly given planning permission for the above scheme has not yet been granted.

140. As a regeneration site, policy PROM LOC1 would continue to support housing proposals on the site, but would also provide greater scope for other uses to be sought. No modification is required.

Sykeside Road, Airdrie (site 7/11 P)

141. The site is within the Airdrie and Coatbridge housing sub-market area, where I have identified a housing land shortfall.

142. The northernmost part of the site is allocated for housing (under reference 7/11 P), and is currently used as a waste management facility. The representation seeks a southward extension to this allocation alongside the Monkland Canal, into an area which

is currently designated as green belt.

143. It is significant that an application for planning permission for residential development over this whole site was refused in June 2017, and a subsequent appeal was dismissed in May 2018. I have reviewed the terms of the appeal decision notice (PPA-320-2119), and I note that this decision was taken in a comparable context of there being an identified housing land shortfall in the Airdrie and Coatbridge housing sub-market area. Despite this shortfall and despite the presumption in favour of sustainable development being a significant material consideration in those circumstances (based on Scottish Planning Policy 2014 provisions which have subsequently been amended), it was concluded that the benefits from developing the site, as a whole, would be outweighed by the harm to the green belt and setting of Airdrie that would result.

144. In the representation to the proposed plan, the outcome of the appeal is acknowledged, but it identifies a range of matters and circumstances which, it is contended, have altered and which now support the site's full allocation.

145. I note the findings in regard to the site's accessibility and biodiversity interest. Indeed the site's accessibility was considered to be a beneficial aspect in the appeal, and I note that the potential for impacts upon nature conservation interests was not determinative.

146. It has been asserted that a substantial tree belt could be planted to create a new and defensible green belt boundary. However, it is not clear what impact this may have on the site's capacity for new housing, and in any event it would not address the main matter here that the open, perceived undeveloped character of the site makes an important contribution to the function of the green belt in this location. Given the topography and close proximity views from the path alongside the Monkland Canal, I consider that the adverse effects of further encroachment into the green belt in this location could not be effectively mitigated.

147. I agree with the assertion that there remains a shortfall in housing land in this area, but that in itself does not justify the release or allocation of land that would otherwise be deemed to be unsuitable. That was the finding in the appeal decision notice and I find that there have been no material changes to the circumstances affecting this site, which would support its allocation at this time. Reference has been made to a current planning application on land to the south and east of the site. However, I understand that application has to date not been determined, and so there is no indication that a more widespread development of this area of green belt would be deemed to be acceptable; the submission of that application has no bearing on the merits of this site presently.

148. The 'bad neighbour' issues associated with the current waste management facility would be addressed by the allocation as proposed, without further extension into the green belt.

149. All told, I find no material basis to deviate from the appeal decision, which found this site to be inappropriate for housing development. The representation includes a 'fallback' request that a smaller area of the site be identified (aligning with the area of land to which the waste management licence relates), in the event that the whole suggested allocation is not accepted. The council has not responded to this part of the representation. From my site inspection, and based on submitted aerial imagery, it is clear to me that the functional area of land currently used as a waste management facility

extends beyond that allocated as site 7/11 P in the proposed plan, and also includes land immediately to the west (which I note is identified in the local plan). This part of the site is identified as green belt in the proposed plan.

150. The evidence before me suggests that the site allocation has erroneously excluded this part of the site. Even if this is not the case, I consider it appropriate for the housing allocation to extend across the area which is currently part of the waste management facility's operation. If it did not, there is a risk that this remaining part of the site would either become disused or continue as a smaller waste management facility, which would be incompatible with the adjacent housing allocation. Neither of the above scenarios would be desirable and I find it would be more appropriate for this part of the site to also be included as part of the housing allocation. I have recommended a modification on this basis.

Land at Garrion Bridge (site 07/20)

151. The representation relating to the site at Garrion Bridge is also recorded in issue 17 Green Belt - Purpose of Place. The text that follows addresses those aspects of the representation other than the green belt designation.

152. On 04 November 2020, an informal request for further information was issued, in order to clarify a matter relating to site identification. The council replied on 06 November 2020.

153. On 21 January 2021, a request for further information was issued in relation to this site. The council's reply included the following. There is a typographical error in the current, adopted local plan. On page 106, the size of the Garrion Farm site is shown as 16 hectares. The figure 16 is in fact the capacity of the site. The size of the site is 2.75 hectares. The site is not shown on the promote map (page 14.5) of the proposed local development plan because it has been in the housing land supply since 2009, but was considered non-effective in the baseline 2017 housing land audit (remaining non-effective in the 2019 housing land audit). It is referred to in the appendix and can be brought forward through the development management process at any time. In any case, housing is a compatible use within an area designated under policy PP3 'General Urban Area'. On page 130 of the modified proposed plan, the table of existing housing sites includes Garrion Farm (North) 3.92 hectares, capacity 98. On page 131, the table of proposed housing sites includes Garrion Farm, Overtown 3.92 hectares, capacity 98. These are correct. There is a combined capacity of 196.

154. I note that pages 363 and 364 of part 2 of the examination report for what is now the current, adopted local plan address a representation regarding land at Garrion Farm. At that time, the land was in the green belt and in an area of great landscape value. The council's intention was that land at this location be identified for construction of 16 dwellings. The representation sought an increase to 30 dwellings and the addition of a tourist gateway incorporating a hotel spa resort and conference centre. The reporter concluded that the proposed development would not be compatible with green belt objectives and would be unsuited to the status of the location as an area of great landscape value. The number of dwellings was not to be increased.

155. The current, adopted local plan shows an area south-west of Garrion Farm and Garrion Tower as a site for housing development. Page 106 of the North Lanarkshire Local Plan includes among housing land supply sites Garrion Farm, Garrion Bridge - 16

hectares, capacity 17.99. As explained above, this should read 2.75 hectares, capacity 16.

156. The proposed local development plan promote map does not identify the 2.75 hectare site as a site for housing. Instead, the site is shown as being within a general urban area. Also within this general urban area is proposed housing site 07/20. The general urban area is surrounded by but is not part of the green belt. The general urban area and its surroundings are designated as a special landscape area.

157. The representation (170-287) "objects to the zoning of the wider site at Garrion Bridge as green belt". The housing sites should be extended to include all of residential zones 2, 3 and 4 shown on the indicative masterplan that has been prepared. The masterplan also envisages enhancement of the riverside area, including woodland management, green network enhancements, recreational provision, land for potential community use, a new public car park and road junction improvement. The proposed plan should identify the wider masterplan site as an extended proposed housing site which would be subject to a residential-led masterplan and which would be suitable for the range of uses listed in the representation.

158. The representation contends that the proposed development would be sustainable. It would help deliver an adequate supply of housing land in the right place. The transport statement refers to bus services adjacent to the site, access by means of a roundabout, a planned upgrade of the A71-B7011 junction and extension of the 30mph speed limit. Visual impact would be acceptable. The enlarged site would be effective.

159. I find that Garrion Bridge is relatively remote from those established communities that have a good range of services and facilities. Wishaw is some five kilometres to the north, Hamilton is some eight kilometres to the north-west and Lanark is some 12 kilometres to the south-east. The site is beside the River Clyde. Journeys from the site involve ascending one or other side of the substantial Clyde valley. For all these reasons, I find that the proposed extended development is unlikely to encourage active travel. Active travel – at least by means of roads and adjacent footways – would be further discouraged by the heavy traffic flows that I observed during my site visit, especially on the A71.

160. It follows from this that development on the extended site is likely to be highly car-dependent, notwithstanding the fact that buses pass the site frontage.

161. I note that promotion of active travel is a recurrent theme in Clydeplan. Scottish Planning Policy, paragraph 273, refers to development in locations that allow walkable access to local amenities and that are also accessible by cycling and public transport. "The aim is to promote development which maximises the extent to which its travel demands are met first through walking, then cycling, then public transport and finally through use of private cars." I find that the proposed extended development would conflict with these policy objectives in Clydeplan and Scottish Planning Policy. It would not be sustainable.

162. I note that the proposed extended housing development would be accompanied by other works such as green network enhancements, public car parking and road junction improvement. Evidence demonstrates no reason why works of these kinds could not be part of the residential development that is identified in the proposed local development plan.

163. From all the foregoing, I conclude that the requested extension of the residential allocation at Garrion Bridge would increase the potential size of the development, where its future occupiers are likely to be highly car-dependent. In turn, this would be contrary to various policies and would be undesirable. In the wider context that the plan identifies sufficient housing land to meet the housing land requirements for the Motherwell housing sub-market area (in which this site is located), I find no justification to increase the area of land allocated for housing in this location. No modification is required.

Land at Dykehead Road, Airdrie (site 08/07)

164. An objection has been made to the allocation of this site for housing, which is currently an area of open space. The representation seeks deletion of this allocation.

165. The site is within the Airdrie and Coatbridge housing sub-market area, where a shortfall in housing land provision has been identified. The council has made this proposed allocation in response to this situation.

166. It is asserted in the representation that based on the site sustainability and delivery matrix completed for the site, it performed poorly and should not have been allocated. Having reviewed the matrix, I disagree with this interpretation and consider that the matrix indicates that the site is a potentially suitable location for housing. I do however consider it necessary to apply professional judgement to this matter.

167. The site's location relates well to established residential development. Although it is towards the edge of Airdrie, it is well within the defined general urban area. In principle I find the general location of this site to be inherently suitable for housing.

168. The main matter is whether the site would be more appropriately retained as open space. During my site inspection I noted that the site forms part of a more extensive area of open space on the opposite side of Dykehead Road. The proposed plan identifies these other areas of open space as Green Network sites. I find that Dykehead Road does create a functional barrier to how site 08/07 relates to the more extensive open space on its south side. I do not find the site lends itself well to use as an informal play space and given the proximity of more extensive areas of open space, I do not consider its development for housing would diminish the quality of the green network or detract from local amenity.

169. I noted that properties on Lochearn Crescent and Springholm Drive back onto the site (with those on Lochearn Crescent being elevated above it). A housing scheme on the site would provide an opportunity for development to relate more directly to Dykehead Road.

170. In conclusion I consider the site is an appropriate housing site in principle, and no modification to the plan is required in response to this representation.

Lammerknowes Road, Banton (site 10/01 P)

171. Objections to the allocation of this site have been raised in a representation. Concerns raised relate to the scale of development relative to the size of the village; adequacy of local roads to provide access; landscape and visual impact; and drainage implications. An alternative, larger site (which would also incorporate the proposed allocated site) is suggested, which it is contended would overcome the issues identified.

172. I note the site has not been subject to a detailed analysis using the site sustainability and deliverability matrix used for most sites. The allocation has instead arisen through the council's urban boundaries review.

173. The council's decision to allocate this site stems from its aim to help sustain local services including the primary school. I consider that the site would appear as a logical extension to the village, relating well to houses on Lammerknowes Road. Care would need to be taken to implement a scheme that would be of an appropriate density and form in this relatively rural location, but these are matters of detail to be addressed through the development management process. I am satisfied that in landscape and visual terms, with care the site could successfully accommodate development.

174. The local road network is constrained to some extent, although Mailings Road is of a sufficient standard and width to accommodate some additional vehicular movements, given the very low volume of traffic on this road. It is not clear at this stage whether access would be taken to the site from Mailings Road, or Lammerknowes Road, or both. As the entrance to the primary school is on Lammerknowes Road, I can see the advantages of taking a direct access from Mailings Road. The site boundary does not abut Mailings Road, and the representation makes reference to there being a 'ransom strip'. I understand that this land is owned by the council however, so I consider it is unlikely that its release and use as an access point could not be agreed, if deemed to be the preferred access point. Trees on this land would potentially be lost, but I do not consider this would be so detrimental as to render the site as unsuitable.

175. There are no obvious site constraints which would prevent development, subject to a satisfactory access being achievable. Drainage has been noted as a concern but there is nothing before me to suggest that this would be an unusually problematic issue on this site.

176. I note the alternative site boundary suggested (SM076 in the council's site map booklet). Whilst I can see the advantages of potentially creating an additional vehicular access to the south side of Banton, the overall size of the allocation would be somewhat greater, out of scale with the size of the village. In any event, this alternative site boundary was suggested relatively late in the process; it was not included in the Main Issues Report, and it has not been the subject of public consultation or strategic environmental assessment. Paragraph 118 of Circular 6/2013: Development Planning says:

> "Reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites."

177. In the circumstances, it would not be appropriate to recommend altering the boundaries of the proposed allocation as suggested. I am satisfied that the allocation, as it appears in the proposed plan, is appropriate and no modification is required.

<u>Land adjacent to Woodhall Road, Newmains (Victoria Park)</u> (site 13/19)

178. This site is proposed for allocation, because it is within the South Wishaw Community Growth Area as identified in the local plan, where growth and development have not been at a pace envisaged. In response, the council applied a mini-charrette

process to identify additional effective housing sites in the proposed plan in the Wishaw area (which is in the Motherwell housing sub-market area).

179. Two representations have been made raising objections to the site's allocation for housing. Matters raised relate to the presence of wildlife including protected species; educational use of the open space by the primary school and nurseries; road safety implications from additional traffic; loss of trees and green network infrastructure; and the presence of former mine workings under the site. The representations seek the identification of the site as an open space.

180. In the absence of a substantive response to these representations by the council, I have reached my conclusions having regard to the completed site sustainability and deliverability matrix, alongside my own observations during my site inspection.

181. In relation to wildlife interests, I note that there are no ecological designations applicable to the site, but that parks and public spaces are listed as a 'Scottish and Local Biodiversity Action Plan Habitat'. That is a generic classification rather than specifically reflective of this site's biodiversity. That said, site-specific 'significant constraints' are referred to in category N5 of the matrix, but this is not elaborated upon. In this context, it seems to me that whilst I have not been presented with evidence of insurmountable issues relating to species and habitats which would indicate that the principle of development would be unacceptable, it is clear that detailed survey work would be required. This would need to be taken into account in determining whether the site could ultimately be appropriately developed. It may be that only some parts of the site could be developed, with other areas necessarily left open as amenity space and habitat.

182. In terms of its wider context, the site relates well to other development, and would provide a logical extension to Newmains. Woodhall Road provides a defensible boundary to the west, whilst the development is surrounded by other development and a sports field and wider, partially wooded greenspace (some of which is proposed to be safeguarded as a 'green network site').

183. The loss of greenspace has been raised in objections. However, I note a contrast between the area which is intended to be safeguarded as such, and the part of the site which forms the housing allocation. The latter area consists mainly of scrubland with what appears to be a relatively well-trodden path running east to west, together with a variety of other informal routes within the site. There is some tree cover on the easternmost part of the proposed allocation. Whilst the site currently provides access to open space, there are numerous signs of antisocial behaviour and it is generally in a condition which would not be conducive to its use as an amenity space. A development would potentially enable part of the site to be retained as an open space, with management arrangements put in place. Whilst the area of open space would be substantially reduced, the quality and usability of available open space could potentially be significantly enhanced.

184. The presence of former mine workings is noted in the council's matrix. This is a common issue in North Lanarkshire and is not necessarily an insurmountable constraint, subject to further investigations.

185. The road safety implications of additional traffic have been raised as a concern. Access to the site is currently constrained. Access directly from Cambusnethan Street (A722) would require land which falls within a separate allocation (23/19) which I return to

below. The former junction between Woodhall Road and the A722 has been permanently closed, and consequently I observed relatively high levels of traffic (including some commercial vehicles) using Eastmuir Street. It would be undesirable to place further pressure on this route. I have no information before me regarding the reason for closing the Woodhall Road/A722 junction or indeed whether there is scope for this to be reinstated in some form. However, I note that the allocation includes land adjacent to Woodhall Road, up to its junction with Overtown Road. This would potentially provide scope to widen the road, together with provision of a footway/cycle route as a second, southern entrance to the site. The junction with Overtown Road would almost certainly require upgrading, but there is space to do this within the allocated site. I do not consider Victoria Street to be a suitable vehicular access option, but it would potentially lend itself well to providing a direct pedestrian/cycle route between the site and the centre of Newmains.

186. All told, whilst there are numerous matters which would require more detailed assessment, and these may heavily influence the layout and number of homes which could be accommodated on this site, I find no overriding reason why the site should not be considered to be appropriate for housing development in principle. I find the allocation is sufficiently justified and no modification is required.

348-414 Cambusnethan Street, Newmains (site 23/19)

187. An objection to this proposed allocation, which has an estimated capacity of eight dwellings, has been made on the same basis as one of the objections to the significantly larger allocation 13/19 which it adjoins (and discussed above). The impact on wildlife, habitat loss, environmental impact and loss of trees is central to this objection.

188. The council has not undertaken an assessment of site 23/19. I issued a further information request to the council, to seek clarification on how this site had been identified for allocation. The site selection methodology background report states that the site has been allocated because it is in accordance with the local plan, and effective local plan sites are included unless there has been a material change in site status.

189. The site is not the subject of a specific housing allocation in the local plan. The council's response asserts that the site is 'designated' under local plan policy HCF 1A. However, that policy is focused on safeguarding residential amenity in residential areas. Whilst the site is within the urban boundary, that is not itself confirmation that development of the site would be capable of being acceptable. No explanation has been provided for why this site has been identified as an allocation in the modified proposed plan, when there are countless other examples of sites which were within the urban boundaries in the local plan but which are not now proposed for allocation.

190. There is a subtle but important distinction to make between land which is within the urban boundary and allocations for a specific use. If a site is within the urban area, the basic principle of housing may be acceptable in the general location, but there still requires to be consideration of site-specific suitability. Where a site is allocated, it would be reasonable to expect that this suitability has already been assessed and accepted, albeit potentially subject to further detailed assessment and other development management considerations which can only be made when a detailed proposal has been formulated.

191. The purpose of this examination is to consider the appropriateness and sufficiency

of the modified proposed plan, rather than a wider review of the approach taken during its formulation. However, in relation to this site specifically, the absence of any assessment of its suitability to accommodate housing during the formulation of either the local plan or the modified proposed plan is problematic, because the concerns raised in the representation have not been considered at any point by the council.

192. From my site inspection, I noted a mature row of trees and hedgerow/scrub along the southern boundary of the site. Aside from the site forming an attractive break in development along Cambusnethan Road, it appeared unlikely that the site could satisfactorily accommodate development whilst also retaining these trees. In the absence of any form of assessment or consideration of trees on this site, either in regard to their amenity value or potential consequential impacts upon habitats for protected species, I do not consider the allocation of this site to be appropriate at this time.

193. I recommend that this allocation be removed, so that the site is unallocated but within the general urban area. This would not preclude housing development from being favourably considered on the site, but nor would the plan indicate that the site could be assumed to be suitable for development.

194. As an aside, given the potential access constraints for the significantly larger site allocation 13/19, site 23/19 may offer a potential solution. Given site 23/19 is council-owned, the council would be in a position to facilitate this if this was deemed to be an appropriate solution for that site (and again if the loss of at least some of the trees was found to be acceptable). My recommended modification, so that site 23/19 is not allocated but within the general urban area, would provide flexibility for exploring this matter further should it be seen to be a favourable option.

<u>Easterton Farm, Caldercruix</u> (site 11/07)

195. Objections to this allocation have been made in a representation. Matters raised include the impact on amenity from construction activity and loss of open space; road safety risk from construction traffic; additional pressure on local school and healthcare capacity; increased potential for antisocial behaviour; the capacity of the local water treatment plant to accommodate further development; and impact on protected species.

196. Some disturbance to nearby residents is an inevitable consequence of new development, but it is an unavoidable temporary impact. In order to minimise the overall effect on amenity, the appropriateness of restrictions to hours of construction may be assessed as part of any forthcoming planning application. The routing and timings of construction traffic can also be stipulated, to minimise associated risks and disturbance.

197. The site is in agricultural use currently and although access into the fields is unrestricted, there were no obvious signs of amenity or recreational use. Whilst it provides a pleasant outlook from the rear of some properties on Easterton Drive, it does not provide any particular amenity value to the community more widely.

198. I note the comments regarding the adequacy of school and local GP practice capacity, but there is no evidence before me to suggest that the development could not be accommodated. If necessary, a developer contribution could be sought to address any deficiencies arising as a consequence of the site's development.

199. Whilst concerns have been raised regarding the potential for antisocial behaviour, a

new residential development is an inherently compatible use adjacent to established housing. The risk of antisocial behaviour occurring on any open space provided as part of the development could be minimised through the site's layout and natural surveillance. It is not a matter which would in principle suggest the site was not suitable for development.

200. No known flooding constraints exist on the site, based on the information within the council's site sustainability and deliverability matrix. I note also that Scottish Water has confirmed that capacity exists at the waste water treatment works.

201. Finally, in relation to nature conservation interests, there are no relevant designations on or in close proximity of the site. The council's matrix nevertheless advises that ecological surveys should accompany any planning applications for the site's development. I am satisfied that this would provide an appropriate safeguard to identify and take account of any protected species which may occupy or use the site currently.

202. Based on the foregoing, I consider the allocation is appropriate and no modification is required.

Village Primary School, Cumbernauld (site 04/04)

203. I note that planning permission for a nursery has been granted on this site, and that no housing development is proposed. The council has indicated that it is agreeable to this site not being allocated for housing given this change in site status.

204. The site is within the Cumbernauld housing sub-market area, where there is a generous supply of housing land. I note that the 2019 housing land audit identifies this site as having a capacity of 13 units, but that it was considered as a constrained site for land-use reasons. I am satisfied that given its location, modest size and constrained status in the housing land audit, the deletion of this site has no meaningful bearing on wider housing land supply matters.

205. Given the likelihood of the site no longer being available for housing, I recommend that the allocation be removed from the plan. As suggested, it should instead revert to being shown as within the general urban area.

Sites at The Neuk, Auchinloch (18/05), Lanrigg Holdings, Chryston (04/05), Gartferry Road, Moodiesburn (10/05) and North of Gartferry Road, Moodiesburn (29/05)

206. The representation relating to the inclusion of the above sites as housing allocations is addressed in our conclusions for Issue 31 Northern Corridor Local Area Partnership.

Objections to non-allocation of sites submitted at Call for Sites/Main Issues Report stages

207. I have concluded above that the proposed plan has identified sufficient housing land to meet the housing land requirements stipulated by Clydeplan, with the exception of within the Airdrie and Coatbridge housing sub-market area, Here I have identified a shortfall of land for private-tenure housing. In this regard, the plan is insufficient and it is therefore appropriate that that we consider whether there is scope to allocate additional suitable sites in the Airdrie and Coatbridge housing sub-market area.

208. Our ability to consider recommending further allocations is restricted to sites for which there are unresolved objections to their current non-allocation, and which are within this housing sub-market area. There is a substantial number of non-allocated sites outwith the Airdrie and Coatbridge housing sub-market area. However, in the context of paragraph 117 of Circular 6/2013: Development Planning, which makes clear that the scope of this examination is restricted to ensuring that the plan's approach is both sufficient and appropriate, it would extend beyond the remit of the examination to consider recommending further housing land allocations be made in parts of North Lanarkshire where sufficient housing land has already been identified to meet the applicable Clydeplan housing land requirements.

209. With this in mind, there would be no value in us reaching detailed conclusions on the potential suitability of sites outwith the Airdrie and Coatbridge housing sub-market area, because in any event their inclusion would not be addressing an insufficient or inappropriate aspect of the proposed plan and we would have no reasonable basis to recommend their allocation. Consequently and for the avoidance of doubt, I find that no modifications to the plan are required in response to representations objecting to the non-allocation of sites for housing in locations not within the Airdrie and Coatbridge housing sub-market area.

210. In some instances, representations raise site-specific matters beyond an objection to a site's non-allocation as a housing site (for example, an objection to a site's inclusion within the green belt rather than the general urban area). Where this is the case we have addressed such matters in the appropriate issue, but we have not revisited the question of whether a site should be allocated for housing in these other issues, for the foregoing reasons.

211. There are unresolved representations relating to the following sites not being allocated, and which are in the Airdrie and Coatbridge housing sub-market area:

- Ryden Mains Farm, Glenmavis (SM063)
- Mosside Farm, Airdrie (SM064) (partly allocated under reference 03/08 P)
- Airdrie Golf Club, Airdrie (SM068)
- Theodore Fields, Burnhead Road, Airdrie (SM038)
- Drumshangie Moss, Airdrie (SM018)
- Meldrum Mains, Glenmavis (SM021)
- Land at Cumbernauld South West (SM048)
- Land at North Myvot Farm, Condorrat Road, Condorrat (SM050)

212. I have considered the representations relating to the above sites in turn, and where appropriate I have drawn conclusions on their suitability for potential inclusion in the proposed plan as additional housing land allocations. Additional allocations would contribute to addressing the shortfall in housing land in the Airdrie and Coatbridge housing sub-market area.

<u>Ryden Mains Farm, Glenmavis</u> (SM063)

213. This site is on the north side of Glenmavis. The site's promoter has identified land on both the west and east side of Condorrat Road (B802), but has proposed that only the land on the west side should be developed for housing. The remaining land has been offered, alongside the residential component, as land for a future cemetery extension and a school field/longer term possible new school site.

214. All of the identified land relates well to Glenmavis. Whilst the site is within the green belt, this area of green belt is extensive and so there would be no threat of coalescence or significant adverse impact upon the wider landscape setting of Glenmavis. This is in contrast to sites before us on the south side of Glenmavis, where there would be a much greater likelihood of perceived coalescence between Glenmavis and Airdrie. Release of this land on the north side of Glenmavis would not compromise the function and purposes of the green belt.

215. In landscape and visual terms, (and focusing on the western part of the site where housing is suggested) I find this area relates relatively well to the existing urban extent of Glenmavis and the local topography. Immediately to the south are properties on Ryden Mains Road. I agree with the representation that this currently appears as a somewhat abrupt urban edge which could be improved by additional development.

216. The western boundary would reflect the topography of the site, whilst the northern boundary would extend up to (and would include) the Ryden Mains Farm buildings. I consider that with careful consideration to site layout, design and associated landscaping, this would be an appropriate extension which would respect the immediate surrounding topography, in particular noting the east-west ridge line which is most apparent on the approach from the north. If development was positioned south of this ridgeline, the topography would assist with successfully assimilating development into the landscape. To the east is the cemetery, which already influences the character and appearance of part of Condorrat Road, being relatively ‘urban’ in nature.

217. In the site suitability and deliverability matrix undertaken by the council, the most notable negative score for the site was in relation to existing and new transport links. Here the council’s Roads and Transport consultation response is reflected, which raised concerns over where access points could be accommodated on Condorrat Road. It also highlighted that there is only one footway and this section of the road is unlit.

218. I have considered whether these roads matters could potentially be insurmountable, and I find this to be highly unlikely. Whilst the road is currently unlit, there is no reason why this could not be required to be addressed as part of a development proposal. As the site abuts the road, there would be sufficient space to both accommodate an additional footway and/or realign the road to accommodate suitable access points into the site. Extending the 30mph limit further north would also be a likely necessity. South of the site, Condorrat Road is already of ample width with footways on both sides.

219. The site is within a reasonable walking distance of services and amenities in the village, and Condorrat Road is on an established bus route. No wider road network issues which may constrain the site’s development have been brought to my attention.

220. No other significant or irresolvable constraints to the site’s development or its effectiveness are identified, and I find the land on the west side of the road is appropriate to allocate for housing, in order to contribute towards addressing the identified housing land shortfall in the Airdrie and Coatbridge housing sub-market area. Given the size of the site however, it may be unlikely that any completions would be made by 2024. I therefore consider the site’s estimated capacity of 120 units should be attributed to contributing to the housing land requirement during the period 2024 – 2029.

221. The offer of land for a cemetery extension and school playing field/new school site

are potentially beneficial aspects of the development, although this has not had any bearing on my assessment of the proposed housing component of the overall site, nor has it influenced my recommended modification to include the western part of the site as a housing allocation.

222. The council has not commented on the offer of making land available for these wider purposes, and so there is no clear evidence of there currently being a need for a cemetery extension, a school playing field and/or a new school. Logic dictates that it may in the future be necessary to extend the cemetery, and the land identified would represent a natural extension. The larger area of land to the north of the cemetery could conceivably also lend itself well to the suggested use, but I am not in a position to confirm that this is needed, or if it is, that this would be a preferred location.

223. With all of the above in mind, it would be more appropriate for the relationship between any development on the west side of Condorrat Road and land release on its east side to be explored through the development management process. This does not however resolve the question of whether the areas of land should be identified in the plan in some way. The representation has sought an amendment to the urban boundary to incorporate this land.

224. The existing cemetery is identified as a 'green network site', and I note elsewhere that school playing fields are typically identified in the same way. The proposed plan currently identifies the land as green belt, which allows developments/changes of use in some limited circumstances, and it could be argued that this would already safeguard the land sufficiently for the proposed uses. However, that would lead to a more reactive approach than if the land in question was identified accordingly in the plan. It would not be appropriate to identify the whole site as a single housing allocation, but I consider the urban boundary could be appropriately modified as shown in appendix C of representation 210. The additional land on the east side of Condorrat Road and within the amended urban boundary should then be identified as a green network site. This would provide an appropriate balance between safeguarding this land from alternative forms of development, whilst giving greater scope to use the land for the uses suggested, should it be needed or otherwise considered desirable.

Mosside Farm, Airdrie (SM064)

225. The representation seeks an extension to the western boundary of the proposed housing site 03/08, which has been allocated within the modified proposed plan. The representor considers that an extension is justified to establish a natural, well-defined, robust and defensible new edge to the green belt in line with criteria set out in Scottish Planning Policy. In addition, the representor considers that expansion of the site would allow for better accommodation of site constraints including effective management of water courses and more scope for a stand-off from the flood plain whilst maximising the developable area.

226. The allocated site lies on the northern side of Airdrie, just north of Monklands Hospital. It occupies the western part of an area of open land, which lies between Airdrie to the north-east, east and south and Coatbridge to the west. The south-western boundary abuts football pitches. To the north lies open countryside.

227. The modified proposed plan inevitably removes the allocated part of the land from the green belt (which has arisen through the council's urban boundaries review), the

proposed extension area would remain within the green belt.

228. A stated key objective of the urban boundaries review was to establish robust, defensible and sustainable long-term urban boundaries, which will accommodate development during and beyond the duration of the local development plan.

229. The representor does not consider that the redundant field boundary, which would form the western boundary of the proposed housing site, meets the policy requirements for green belt boundaries set out in Scottish Planning Policy. Instead, it has proposed using the course of the North Burn to the west.

230. During my site inspection I saw that the topography of the wider area appears to resemble a shallow bowl. Ground levels fall from east to west and land to the north and south slopes down towards the burn, which runs east-west across the allocated site. A second burn flows north to south beyond the allocated site.

231. The upper sloped areas to the south of the allocated site have been developed for housing, whilst the steeper sloped areas to the north are undeveloped. The dominant vegetation appears to be fen with areas of running and standing water, wet grassland and scrub. There are areas of more substantial woodland around the edges of the area.

232. When viewed from the north-east, I saw that there is little to distinguish between the allocated site and the proposed extension area, or indeed between the allocated site and the wider area of green belt. From this perspective, I accept that the proposed boundary is not particularly well defined.

233. Paragraph 51 of Scottish Planning Policy sets out the factors that should be considered in defining a green belt boundary. It notes that there should be clearly identifiable visual boundary markers based on landscape features such as rivers, tree belts, railways or main roads. It further notes that hedges and field enclosures will rarely provide a sufficiently robust boundary.

234. Whilst I accept that the current boundary, which relies on a defunct hedge line, is not generally recommended through Scottish Planning Policy, I found no difficulty in identifying this boundary on the ground. The hedge is bordered by an informal footpath, which together create a clearly identifiable landscape feature.

235. In broad terms, the representor's proposed use of the North Burn would align more closely with the guidance set out in Scottish Planning Policy. Nevertheless, based on my observations, it does not mark an obvious visual or physical boundary between different landscape or vegetation features.

236. I saw that the undeveloped land forms an important function in preventing coalescence between the north of Airdrie and Coatbridge to the west. Although development within Coatbridge is visible, when viewed from the east, the wide expanse of open space provides a visual separation between the settlements. The proposed allocation already acts to reduce the separation between the settlements. The proposed extension would further encroach on this.

237. In any case, given that the land to the east of the proposed green belt boundary has been allocated for housing, the form of the boundary could be considered as temporary in nature. The proposed new development provides the opportunity to

strengthen the boundary.

238. The modified proposed plan site selection methodology background report (AD25) sets out how the allocated site and its extension were assessed in terms of suitability for housing. I note that in terms of the site sustainability and deliverability matrix criteria/ factors, the site met the 'social capital' scores for further consideration. Nevertheless, constraints in terms of 'economic capital' and 'natural capital' criteria were identified, including in terms of transport, flood risk, presence of potentially contaminated land and mine entries, and presence of a Site of Importance for Nature Conservation (SINC).

239. SINCs form part of the green network assets, which are safeguarded within the modified proposed plan through Policy PROT A Category A3. This states that planning permission will only be granted for proposals potentially affecting such sites if it can be demonstrated to the council's satisfaction that there will be no adverse impact, or that any impacts can be mitigated in environmental terms relevant to the impact.

240. The Environmental Report (AD38) notes that in response to these constraints, the council has promoted a reduced site to help to meet the housing land requirement in the Airdrie and Coatbridge housing sub-market area. In doing so, the council notes that release of the larger site would have a serious environmental effect on the designated SINC and that the current boundary has been set to take into account concerns raised through internal consultation. Despite this, I note the comments of the council's biodiversity team, which has advised that the ecological constraints are so significant that even development on the smaller, allocated part of the site would be undeliverable in the next five years.

241. I have considered the indicative masterplan and representor's view that an adjustment to the green belt boundary would provide various opportunities for habitat creation and avoidance of the flood plain. However, I am not persuaded that these benefits would mitigate or outweigh the significant disadvantages of expanding the site further.

242. In conclusion, I find that the constraints relating to nature conservation interests and the SINC designation, and the important function this area serves in terms of contributing to the green network and green belt, outweigh the advantages of extending the area of land which is already allocated for housing. This is despite there being a shortfall of housing land in the Airdrie and Coatbridge housing sub-market area. No modifications are required.

<u>Airdrie Golf Club, Airdrie</u> (SM068)

243. The representation objects to the non-allocaton of part of Airdrie Golf Club for housing development. The site being suggested is currently occupied by the car park, clubhouse and part of the course. If the site was allocated for housing, it has been suggested that a northern and eastern extension to the golf course would accompany the proposal, including the relocation of the clubhouse adjacent to the A73 (Stirling Road).

244. The suggested allocation is on the northwest side of Airdrie, beyond but adjacent to the boundary of the general urban area. It is designated as within the green belt in the proposed plan.

245. I find the section of green belt in question provides effective separation between

Airdrie and the village of Glenmavis a short distance further north. There is currently no sense of coalescence of the two settlements, with Glenmavis retaining its own character and identity. The site's development for housing would reduce this separation by approximately half along Glenmavis Road, which would significantly diminish the effectiveness of the green belt in this location, to the extent that any perceived distinction between Airdrie and Glenmavis would be likely to be minimal.

246. This sense of emerging coalescence would be exacerbated to some extent by the local topography. The urban extent of Airdrie, as seen from Glenmavis Road, is largely visually contained by a ridgeline, and it has very little influence upon the more rural character of land to the immediate north including the site for which an allocation is sought. The area separating Airdrie and Glenmavis falls within a shallow glen, which has a fundamentally rural character because of the lack of visibility between settlements, which are largely hidden from view by a combination of the topography and tree cover. Residential development on this site would introduce an urban character into this area, undermining the green belt's function in this location.

247. There are some inherent uncertainties regarding how the golf course could be reconfigured to enable the site to be released for housing, if this was considered to be desirable. I am not in a position to make any findings on the likely acceptability of the proposed golf course extensions, or the proposed alternative clubhouse location. Furthermore, I note that the indicated northern extension to the golf course would be on land which also forms part of another suggested housing allocation referred to in a representation (site SM021, referred to below). The deliverability of the necessary golf course extension is therefore unclear.

248. All told, despite the shortfall of housing land identified in the Airdrie and Coatbridge housing sub-market area, for the above reasons I find the adverse effects of developing the site, and uncertainties over its deliverability, indicate that this site should not be included as a housing allocation at this time.

<u>Theodore Fields, Burnhead Road, Airdrie</u> (SM038)

249. The site is within the Airdrie and Coatbridge housing sub-market area, where there is an identified housing land shortfall. My conclusions here are focused on whether the suggested allocation of the site for housing development, as set out in the representation, would be an appropriate modification. The question of whether this site ought to be removed from the green belt is also considered in issue 18.

250. Points made in representation 239 include the following: The urban boundary takes an unnatural course to exclude the site at Theodore Fields. The proposed development would be small-scale. The site does not contribute to the green belt. It is used for fly tipping, joy riding, vandalism and car dumping. It is detrimental to local amenity. Concern about accessibility could be addressed, for example by road widening, road realignment, bridge replacement and provision of a roundabout. The proposed development would be a natural extension of the recently developed urban area.

251. I note that the green belt boundary in the proposed plan is the same as that in the currently-adopted local plan. On the south side of the representation site, the boundary follows the rear boundaries of houses on the north side of Church Crescent. I find that this is a clearly-demarcated line, reinforced by the presence of a belt of trees.

252. On the west side of the representation site, the green belt boundary follows Burnhead Road. Burnhead Road separates the built-up area of Clarkston and associated open space from countryside to the north and east. I find that this is a well-defined line.

253. In landscape terms, the northern and north-eastern boundaries of the representation site are weakly defined.

254. Taking account of the foregoing, I find that the green belt boundary has a natural, well-defined and robust character. Following on from this, I find it unlikely that development on the site would be seen as a natural extension of the urban area and that the site makes a useful, if local, contribution to green belt objectives.

255. Regarding access to Burnhead Road, I note the narrow bridge at the south-western corner of the site and the sharp bend at the north-western corner of the site. The road lacks footways. In its present condition, this part of Burnhead Road is not suitable as a means of access to the proposed development.

256. I note the reference to possible road improvements. The representation does not include a transport assessment or other professional appraisal of what improvements would be needed. Nor does the representation include a note of whether such improvements would affect only land under the control of the developer. Nor does the representation include an analysis to show whether the cost of road improvements along with the cost of any other necessary infrastructure could be borne by the developer.

257. Regarding detriment to local amenity, if the condition of the site were seen as adversely affecting the amenity of its surroundings, it would be open to the council to take action to require proper maintenance of the site, for example by serving a notice in terms of section 179 of the Town and Country Planning (Scotland) Act 1997 (as amended). In any event, anti-social behaviour would not itself be a sufficient basis upon which to allocate this site for development.

258. My conclusion is that the case for development on the representation site has not been substantiated, and it is unclear whether satisfactory access could be achieved. Given these uncertainties, there is insufficient evidence upon which an allocation could be soundly based. No modification is therefore required.

Drumshangie Moss, Airdrie (SM018)

259. The council's summary of representations states that: "Albert Bartlett & Sons (Airdrie) Ltd (242) objects to the non-allocation of CfS/MIR Site 0024/07 Drumshangie Moss, Airdrie (SM018), as a Proposed Housing Development Site, on the grounds the site capacity is understated and should be updated within the Plan as per the extant planning application 18/01785/PPP."

260. Site map SM018 identifies a much wider area than this representation is referring to. Having reviewed the representation carefully, I am clear that the site being referred to is proposed housing allocation 01/07 P, and its stated capacity relative to the scale of proposed development. I have already found above that the site's capacity should be amended to reflect the number of units granted planning permission.

261. There is not an outstanding representation that relates to the non-allocation of site SM018 for housing development. In issue 2, the same representor has objected to the

proposed plan on the basis that Drumshangie Moss is not identified as a strategic regeneration priority, as a location for a replacement Monklands Hospital. That aspect of the representation is addressed in issue 2 and I have not repeated our conclusions on that matter here. The representation provides no basis to consider allocating additional land at Drumshangie Moss for housing, and no modification is required.

Meldrum Mains, Glenmavis (SM021)

262. The representation seeks the allocation of this site, on the south side of Glenmavis, with an indicative capacity of approximately 300 houses. Part of the case being made for this site is the contention that it would offer a more sustainable location than that offered by the proposed allocation of land at Stirling Rd/Greengairs Rd at Stand (Ref: 01/07 P). The representation raises an objection to that allocation and requests that site SM021 be allocated in its place.

263. As already outlined in my conclusions above, planning permission in principle has now been granted for a mixed-use development on site 01/07 P, which includes provision for up to 523 dwellings. The representor's case for allocating land at Meldrum Mains instead of site 01/07 P has therefore been overtaken by events, and I do not consider that it would be appropriate to deallocate that site now that consent has been granted.

264. Despite this, given the identified shortfall in housing land in the Airdrie and Coatbridge housing sub-market area, there remains a case for allocating additional, suitable sites which could contribute towards addressing this shortfall. In this context, the case for allocating land at Meldrum Mains is not in my view weakened by the planning permission which is now in place on site 01/07 P.

265. The representation is accompanied by an indicative development framework / conceptual plan and a transport and access appraisal, to which I have had regard. Whilst the site abuts the general urban area of Glenmavis, there are a number of similarities between this site and the Airdrie Golf Club site already discussed above.

266. The site is located within the same general area of green belt as the suggested Airdrie Golf Club site, which currently provides effective separation between Glenmavis and Airdrie. The Meldrum Mains site effectively occupies the opposite (south-facing) slopes of the same intervening shallow glen. It provides an attractive setting for Glenmavis, and contributes to the village's identity, separate from Airdrie.

267. As with the Airdrie Golf Club site, I consider that encroachment into this area of green belt would result in a strong sense of coalescence between Glenmavis and Airdrie. The current fundamentally rural character of this relatively small gap between the two settlements would in my view be altered to the extent that the green belt's function would be undermined if the Meldrum Mains site was developed. This is despite there being a well-established tree line along Glenmavis Road and around the site which provides some, but not complete, screening of views into and across the site. Based on the submitted conceptual plan, phases 1 and 2 would be likely to have the greatest impact upon the green belt's function.

268. The Meldrum Mains site contains a network of informal paths, and its development would reduce the amenity value this provides. I do not consider this matter to be pivotal in the question of the site's suitability for development however.

269. In conclusion, I consider there is value in maintaining the green belt in this location to safeguard against the coalescence of Airdrie and Glenmavis. At this time, I consider the importance of this outweighs the benefits of allocating the site, and its contribution towards addressing the shortfall in housing land in this housing sub-market area. No modification is required.

Land at Cumbernauld South West (SM048)

270. The representation contends that land at Cumbernauld South West is suitable for housing development.

271. Although the site is within the Airdrie and Coatbridge housing sub-market area, it is adjacent to the urban area of Cumbernauld. The proposed development would be part of Cumbernauld. For this reason, I find that the site is not particularly well located for meeting the housing land requirements that are primarily associated with Airdrie and Coatbridge. Other things being equal, it would be preferable to address the housing land requirement for Airdrie and Coatbridge by identifying sites where there is a prospect of development being integrated into the urban area of Airdrie and Coatbridge. However, in the circumstances of this examination, where I have found there to be a shortfall of housing land relative to the housing land requirements applicable to the Airdrie and Coatbridge housing sub-market area, it is appropriate to give due consideration to all site options that could contribute to addressing this shortfall.

272. Among other things, the representation says that residential and associated development on the land south west of Cumbernauld would accord with policy 8 of Clydeplan, would not be detrimental to landscape or ecology, would have excellent links to rail and bus services, would be within walking distance of schools, local services and other amenities and would have convenient access to A73. It outlines that potential impacts identified in the council's strategic environmental assessment have been addressed in the development framework report.

273. The representation does not argue that the site has no merit as part of the green belt. The representation seeks removal of the site from the green belt solely as a consequence of allocating it for housing development. The development framework report contends that removal of the site from the green belt would not impact on the ability of the remaining green belt around Cumbernauld to achieve the purposes of a green belt.

274. From submissions and from a site inspection, I find that the site makes a positive contribution to the green belt around Cumbernauld, with the A73 helping to provide a robust southwestern boundary to this part of Cumbernauld. Whilst the green belt to the south is extensive, and development of the representation site would not lead to coalescence with other urban areas, its development would detract from the landscape setting of Cumbernauld and it would be a significant extension into what is an effective area of green belt and open countryside.

275. The site extends to 46.9 hectares and is said to be capable of accommodating around 850 new homes along with associated open space, infrastructure and a mixed-use neighbourhood centre. This scale of development is comparable to the scale of development envisaged on each of Cumbernauld's two community growth area sites at Palacerigg and Mid Forrest. Palacerigg is within one kilometre of the representation site. Mid Forrest is at a distance of about three kilometres.

276. From the foregoing, I find it likely that development on the representation site could have an impact on progress with the planned developments at Palacerigg and Mid Forrest. These are one of the community growth areas identified in Clydeplan, so care is needed to ensure that they are not unnecessarily impeded.

277. What I find to be determinative in respect of this site's suggested allocation is that it is of a strategic scale, and I consider it would be inappropriate to introduce a site of this nature at the examination stage. The implications for the plan's spatial strategy would need to be considered holistically, and this is not a matter which could be undertaken satisfactorily at this stage. To some degree this is compounded by the site's position adjacent to Cumbernauld, where we have found there to be a sufficiently generous supply of housing land. It is unclear whether, in practice, this site would help to address the needs and demands arising in the Airdrie and Coatbridge housing sub-market area, despite the fact that it would legitimately count towards meeting its housing land requirements.

278. If there is to be an extension of Cumbernauld on the scale proposed in the representation, it would seem sensible to appraise all possible development sites in and on the edge of the town. It may be that any such extension would be better located on a site other than the representation site. More fundamentally, this also gives rise to strategic questions over whether or not the housing land requirements for the Airdrie and Coatbridge housing sub-market area should be partly met though a southward extension to Cumbernauld.

279. Based on the foregoing, and given the strategic implications that would arise from allocating this site which cannot be explored through this examination, no modification is required.

<u>Land at North Myvot Farm, Condorrat Road, Condorrat</u> (SM050)

280. A representation seeks the allocation of this site for housing. Similar to the 'Cumbernauld South West' site (SM048) discussed above, this site is within the Airdrie and Coatbridge housing sub-market area but if developed, it would extend the urban area of Condorrat which is within the Cumbernauld housing sub-market area.

281. For the same reasons as with the Cumbernauld South West site, I find that this site is not particularly well located for meeting the housing land requirements that are primarily associated with Airdrie and Coatbridge. Other things being equal, it would be preferable to address the housing land requirement for Airdrie and Coatbridge by identifying sites where there is a prospect of development being integrated into the urban area of Airdrie and Coatbridge. However, in the circumstances of this examination, where I have found there to be a shortfall of housing land relative to the housing land requirements applicable to the Airdrie and Coatbridge housing sub-market area, it is appropriate to give due consideration to all site options that could contribute to addressing this shortfall.

282. In support of the site's inclusion as a housing allocation, the site's promoter has provided various supporting submissions, to which I have had regard. Amongst other submissions these include a design and access statement, a masterplan, ecological appraisals, a transport assessment and engineering and drainage reports. The site is estimated to have capacity for approximately 200 homes.

283. In issue 28, the council has drawn attention to a recent refusal of planning permission in principle on this site under reference 17/00887/PPP, and a subsequent appeal (PPA-320-2126) was dismissed in February 2019. I have reviewed the terms of the appeal decision notice, and I note that this decision was taken in a comparable context of there being an identified housing land shortfall in the Airdrie and Coatbridge housing sub-market area. Despite this shortfall and despite the presumption in favour of sustainable development being a significant material consideration in those circumstances (based on Scottish Planning Policy 2014 provisions which have subsequently been amended), it was concluded that the benefits from developing the site, as a whole, would be outweighed by the harm to the green belt's character and function around the boundary of Condorrat.

284. Whilst in the context of this plan there is also a shortfall in housing land in this area relative to the applicable housing land requirement, that in itself does not justify the release or allocation of land that would otherwise be deemed to be unsuitable. That was the finding in the appeal decision notice and I find that there have been no material changes to the circumstances affecting this site, which would justify me reaching a different conclusion to that of the reporter in the foregoing appeal in regard to the site's suitability. Indeed based on my own observations during my site inspection, I share the view of the appeal reporter that this site would not represent an appropriate urban extension for the same reasons as expressed in her decision notice.

285. The site is positioned adjacent to Condorrat, which itself is within the Cumbernauld housing sub-market area where we have found there to be a sufficiently generous supply of housing land. It is unclear whether, in practice, this site would help to address the needs and demands arising in the Airdrie and Coatbridge housing sub-market area, despite the fact that it would legitimately count towards meeting its housing land requirements.

286. All told, I find no material basis to deviate from the appeal decision, which found this site to be inappropriate for housing development. No modification is required.

Representations objecting to non-allocation of new sites

287. The following sites have been put forward to be considered as housing land allocations, but were introduced subsequent to the Main Issues Report consultation:

- SM001: Site South of New Edinburgh Road, Newhouse (Greenside Farm)
- SM002: Land between the A8 and M8, south of Coatbridge, Midshawhead
- SM003: Land east of Biggar Road, Cleland
- SM004: Land West of Glenmavis Road, Glenmavis
- SM005: Land to the south of Gartloch Road (Joeswood Site 2)
- SM006: Hillhouseridge, Shotts
- SM007: Dullatur Golf Course
- SM008: Land north of Chapelknowe Road Carfin
- SM009: Land on Wishaw Low Road, Cleland, south of Glen Noble (208.361 small site)
- SM010: Land on Wishaw Low Road, Cleland, south of Glen Noble (208.401 large site)
- SM011: Former Orchard Farm, Carnbroe
- SM012: Parts of sites at Gartloch Road, Gartcosh (Joeswood Site 1)

- SM013: Land at Orchard Brae
- SM014: Chapelton 1, Condorrat
- SM015: Chapelton 2, Condorrat
- SM016: Land at Arbuckle Road, East Plains
- SM017: Ryefields, Glasgow Road, Drumpellier
- SM070: Mill Road, west of Banton (North Site)
- SM071: Mill Road, west of Banton (South Site)
- SM072: Land north of Torbothie Road, Shotts
- SM073: Land south of Torbothie Road, Shotts
- SM074: Land south of Reema Road, Bellshill
- SM075: Land at Townhead Farm, Newarthill
- SM076: Land at Banton

288. The council has confirmed that the planning status of the above sites has not changed since the proposed plan was submitted for examination.

289. As a consequence of these sites having been put forward when the plan was already at a relatively advanced stage of formulation, none of these sites have been the subject of public consultation, and nor have they been subject to strategic environmental assessment. It was not incumbent upon the council to undertake a further round of consultation and assessment to account for these new site suggestions.

290. Paragraph 118 of circular 6/2013: Development Planning says:

> "Reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites."

291. In the absence of sufficient evidence of public participation and environmental information, it would not be appropriate to recommend altering the proposed plan to allocate any of these 'new' sites. With this in mind, we have not undertaken any further assessment of the potential suitability of these sites, including those in the Airdrie and Coatbridge housing sub-market area.

Overall conclusions on the implications of the housing land shortfall in the Airdrie and Coatbridge housing sub-market area

292. In part 1 of my conclusions, I have found that the modified proposed plan has identified insufficient housing sites to meet the housing land requirement for private tenure homes in the Airdrie and Coatbridge housing sub-market area.

293. In part 2, as part of my consideration of site-specific representations, I have explored all potential opportunities to allocate additional suitable land for housing in the Airdrie and Coatbridge housing sub-market area.

294. The options available are limited, and based on my assessment of all potential sites, I am recommending a modification to allocate only one additional site for housing, which has an anticipated capacity of 120 homes. This allocation makes a contribution to addressing the estimated shortfall, but falls some way short of addressing the entire shortfall.

295. As a consequence, the plan still does not identify sufficient housing land to meet the housing land requirements set for the Airdrie and Coatbridge housing sub-market area. In this specific regard, the plan is not compliant with Scottish Planning Policy paragraph 119, which states: "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."

296. I consider the overall significance of this deficiency is tempered by the fact that the plan does make adequate provision of housing land to meet the all-tenure and private tenure housing land requirements for North Lanarkshire as a whole. I consider it likely therefore that any frustrated ability to meet need and demand in the Airdrie and Coatbridge housing sub-market area generated by an insufficient housing land supply would, to a large extent, be displaced and met elsewhere in North Lanarkshire. I do not consider it likely that this identified shortfall would suppress the rates of development coming forward in North Lanarkshire as a whole.

297. This does not absolve the council of its responsibility to maintain a minimum of five years supply of effective housing land at all times however. The identified shortfall of housing land relative to the housing land requirement in the Airdrie and Coatbridge housing sub-market area is likely to compromise the council's ability to do so in this housing sub-market area. This is not a certainty, as there are other factors which may influence this going forwards (such as whether the annual uptake of land by developers is faster or slower than programmed; or if the applicable housing land requirements are altered).

298. In part 1 of my conclusions I considered representations in relation to policy PROM LOC3. There I found that modifications to the policy were necessary to make appropriate allowance for sustainable, suitable housing proposals on non-allocated sites (including on sites which would ordinarily be safeguarded from development) to be considered favourably, where a shortfall in the five-year effective land supply is identified.

299. Beyond the allocation of additional land and the modification to policy PROM LOC3 to better support additional land release for housing should it be needed to address a shortfall in the five-year effective housing land supply, there are no other actions which can realistically be taken within the constraints of this examination to resolve this matter.

300. I would therefore recommend that the council takes post-adoption action to address the deficiency in identified housing land in the Airdrie and Coatbridge housing sub-market area. This should initially focus on ensuring that wherever practicable, appropriate action is taken by the council to help to address and overcome constraints to development on identified sites, particularly in the Airdrie and Coatbridge housing sub-market area, where constraints are identified in the current and future housing land audits. By ensuring as many of these sites as possible become effective as quickly as possible, this would help to minimise any periods of there being a shortfall in the five-year effective land supply, as well as reducing the scale of any such shortfall.

301. The council should also undertake an early review of the adequacy of its housing land against emerging and finalised replacement housing land requirements, as these become available in due course. Should this indicate a need to identify additional land for housing, I recommend that the council should aim to review its local development plan and the housing sites it identifies earlier than the council may have currently intended.

Reporter's recommendations:

1. Replace PROM LOC3 policy and guidance wording with the following:

"North Lanarkshire Council will provide a generous supply of land to maintain a minimum five-year effective housing land supply at all times for each housing sub-market area and the local authority area. Progress in meeting the housing supply targets and housing land requirements will be monitored using housing completions to date and the programming of the effective housing land supply set out in agreed annual housing land audits. The housing land requirements are set out in the appendices.

Those sites promoted in the Plan will be brought forward through consideration of applications for planning permission and/or in accordance with the Action Programme.

For proposals for housing development in General Urban Areas, Strategic Town Centres, Other Town Centres and Local Centres, please refer to Policies PP1A, PP1B, PP1C, PP3, AD1A, AD1B, AD1C and AD3.

Any sites proposed outwith the parameters of Policy PROM LOC3 will only be supported if they accord with Policies PP4, PP5, AD4 and AD5 of this Plan.

In the event of a shortfall in the five-year effective housing land supply being demonstrated (by local authority area and/or housing sub-market areas), both brownfield and greenfield sites may be granted planning permission where it is demonstrated that the following criteria are satisfied:

- the development will help to remedy the shortfall identified;
- the development will contribute to sustainable development;
- the development will be in keeping with the character of the settlement and the local area;
- the development will not undermine Green Belt objectives; and,
- any additional infrastructure required as a result of the development is either committed or to be funded by the developer.

All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

2. Replace 'Housing Land Requirements Appendix on pages 138 – 143 with the following:

Strategic Development Plan

Clydeplan Strategic Development Plan Area comprises the eight local authorities of the Glasgow and the Clyde Valley City Region. Its role is to maintain a Strategic Development Plan for the area.

The long-term need for housing land across the eight authorities is worked out using a mechanism called the Housing Need and Demand Assessment.

The latest Housing Need and Demand Assessment methodology (housing estimates) was agreed by the Scottish Government's Centre for Housing Market Analysis as "robust and credible" in May 2015.

The Clydeplan Strategic Development Plan Proposed Plan was approved by Scottish Ministers in July 2017. The North Lanarkshire Local Development Plan is required to align with the Clydeplan Strategic Development Plan.

Housing need

The Housing Need and Demand Assessment process calculated the housing position for the Clydeplan Strategic Development Plan. The housing supply targets and housing land requirements for North Lanarkshire and its housing sub-market areas are presented later in a series of tables.

The "requirement" is to show the supply of land allocated for all tenures of housing. This means there is a balance of private and social components within the overall figure of 20,730 homes required in North Lanarkshire over the Clydeplan period of 2012 – 2029. The split is influenced by the availability of funding for social housing.
The Housing Need and Demand Assessment considered specialist housing provision, including sites for Gypsy Travellers, and its conclusions did not support making any specific allocations. Each local authority should consider applications for private sites on their own merits. North Lanarkshire Local Development Plan is consistent with this position.

Local Development Plan policy

The policy in this Local Development Plan is that:
North Lanarkshire Council will provide a generous supply of land to maintain a minimum five-year effective housing land supply at all times for each housing sub-market area and the local authority area. Progress in meeting the housing supply targets and housing land requirements will be monitored using housing completions to date and the programming of the effective housing land supply set out in agreed annual housing land audits.

The Area Strategies contain the details of the allocated land supply for each area.

Housing Land Requirements

The following tables set out the housing land requirements set by the Clydeplan Strategic Development Plan and applicable to North Lanarkshire. These are split into two periods (2012 – 2024 and 2024 – 2029) as well as the full period of 2012 – 2029.

Scottish Planning Policy requires local development plans in city regions to 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. The housing land requirements set by Clydeplan have therefore also been extrapolated for the period 2029 - 2031.

The estimated number of homes on effective and programmed sites, and the potential contribution from currently constrained sites, are based on figures taken from the 2019 housing land audit, adjusted to reflect recommendations made in the LDP examination report. In the tables, the housing land supply situation relative to the applicable housing land requirements set by Clydeplan are expressed as a range, as the precise number of completed homes which can be expected to be built on currently constrained sites is uncertain. Whilst it is possible that no homes will be completed on constrained sites, this is very unlikely.

No account has been taken of the possible contribution to the housing supply from small housing sites and windfall sites which are not recorded by the housing land audit process.

All tenure, North Lanarkshire					
Plan period	**2012 - 2024**	**2024 - 2029**	**2012 – 2029**	**2029 – 2031**	**2012 - 2031**
Housing supply target	12,720	5,300	18,020	2,120	20,140
Housing land requirement (HLR)	14,630	6,100	20,730	2,439	23,169
Completions 2012 - 2019	6,950		6,950		6,950
Residual HLR	7,680	6,100	13,780	2,439	16,219
Effective/programmed supply	9,096	5,906	15,002	742	15,744
Contribution from currently constrained sites, expected to become effective (range)	0	0 – 3,896	0 – 3,896	0 (to avoid double-counting 3,896)	0 – 3,896
Total supply (range)	9,096	5,906 – 9,802	15,002 – 18,898	742	15,744 – 19,636
Surplus(+)/ shortfall(-) in established supply	+1,416	Between -194 and +3,792	Between +1,226 and +4,218	-1,698	Between -475 and +3,417

Private tenure, Cumbernauld housing sub-market area					
Plan period	**2012 - 2024**	**2024 - 2029**	**2012 – 2029**	**2029 – 2031**	**2012 - 2031**
Housing land requirement (HLR)	2,900	1,210	4,110	484	4,594
Completions 2012 - 2019	1,854		1,854		1,854
Residual HLR	1,046	1,210	2,256	484	2,740
Effective/programmed supply	2,066	1,482	3,548	219	3,767
Contribution from currently constrained sites, expected to become effective (range)	0	0 - 534	0 - 534	0 (to avoid double-counting 534)	0 - 534
Total supply (range)	2,066	1,482 – 2,029	3,548 – 4,082	219	3,767 – 4,301
Surplus(+)/ shortfall(-) in established supply	+1,020	Between +272 and +806	Between +1,292 and +1,826	-265	Between +1,027 and +1,561

Private tenure, Airdrie and Coatbridge housing sub-market area					
Plan period	**2012 - 2024**	**2024 - 2029**	**2012 – 2029**	**2029 – 2031**	**2012 - 2031**
Housing land requirement (HLR)	4,060	1,690	5,750	676	6,426
Completions 2012 - 2019	1,488		1,488		1,488
Residual HLR	2,572	1,690	4,262	676	4,938
Effective/programmed supply	1,768	1,414	3,182	195	3,377
Contribution from currently constrained sites, expected to become effective (range)	0	0 - 647	0 – 647	0 (to avoid double-counting 647)	0 – 647
Total supply (range)	1,768	1,414 – 2,061	3,182 – 3,820	195	3,377 – 4,024
Surplus(+)/ shortfall(-) in established supply	-804	Between -276 and +371	Between -1,080 and -433	-481	Between -1,561 and -914

Private tenure, Motherwell housing sub-market area					
Plan period	**2012 - 2024**	**2024 - 2029**	**2012 – 2029**	**2029 – 2031**	**2012 - 2031**
Housing land requirement (HLR)	4,640	1,930	6,570	772	7,342
Completions 2012 - 2019	2,330		2,330		2,330
Residual HLR	2,310	1,930	4,240	772	5,012
Effective/programmed supply	2,381	2,392	4,773	328	5,101
Contribution from currently constrained sites, expected to become effective (range)	0	0 – 2,326	0 – 2,326	0 (to avoid double-counting 2,326)	0 – 2,326
Total supply (range)	2,381	2,392 – 4,718	4,773 – 7,099	328	5,101 – 7,427
Surplus(+)/ shortfall(-) in established supply	+71	Between +462 and +2,788	Between +533 and +2,859	-444	Between +89 and +2,415

Private tenure, North Lanarkshire					
Plan period	**2012 - 2024**	**2024 - 2029**	**2012 – 2029**	**2029 – 2031**	**2012 - 2031**
Housing supply target	10,080	4,200	14,280	1,680	15,960
Housing land requirement (HLR)	11,590	4,830	16,420	1,932	18,352
Completions 2012 - 2019	5,672		5,672		5,672
Residual HLR	5,918	4,830	10,748	1,932	12,680

Effective/programmed supply	6,215	5,288	11,503	742	12,245
Contribution from currently constrained sites, expected to become effective (range)	0	0 – 3,507	0 – 3,507	0 (to avoid double-counting 3,507)	0 – 3,507
Total supply (range)	6,215	5,288 – 8,795	11,503 – 15,010	742	12,245 – 15,752
Surplus(+)/ shortfall(-) in established supply	+297	Between +458 and +3,965	Between +759 and +4,262	-1,190	Between -431 and +3,072

3. Update the 'Housing Land Audit 2017' appendix, to reflect sites identified in the 2019 housing land audit. Amend the title of the appendix.

4. Amend the boundary of site 7/11 P (Sykeside Road, Airdrie) to include area of land marked by red dotted line in document RD169 as part of the allocated housing site.

5. Delete housing allocation 04/04 shown on LDP Promote Map 4.5, (Village Primary School, Cumbernauld), and show the site as within the General Urban Area. Make consequential amendments to the plan to delete reference to the site.

6. Amend the stated capacity of site 01/07 P on page 99 of the proposed plan, by deleting '300' and inserting '523'. Make consequential amendment to the total housing opportunity.

7. Delete housing allocation 23/19 shown on LDP Promote Map 12.6 (248-414 Cambusnethan Street, Newmains), and show the site as within the General Urban Area. Make consequential amendments to the plan to delete reference to the site.

8. Amend the urban boundary on the north side of Glenmavis as shown in representation 210 appendix C. Land on the west side of Condorrat Road to be included as a housing site. Land on the east side of Condorrat Road to be a green network site. Add reference to the site on page 99 under 'proposed housing development sites as 'Ryden Mains Farm, Glenmavis' with a capacity of 120 units.

Issue 005	**Special Landscape Areas & Green Network Improvements**	
Development plan reference:	PROM LOC4 Special Landscape Areas & Green Network Improvements Page 30	**Reporter:** Sue Bell
Body or person(s) submitting a representation raising the issue (including reference number):		
W D & R T Hill (221) Sandra McCumisky (236) Amanda McConville (251) Scottish Government (255) Cumbernauld Village Community Council (270) Scottish Natural Heritage (SNH) (272) Scottish Environmental Protection Agency (273) CC Land Services Ltd (279) Argyle (289)		
Provision of the Development Plan to which the issue relates:	PROM LOC4 POLICY Special Landscape Areas & Green Network Improvements North Lanarkshire Council will promote the designation of Special Landscape Areas and the enhancement and development of Seven Lochs Wetland Park and the Green Network, as listed in Area Strategies. PROM LOC4 Guidance Any proposals affecting the Special Landscape Areas and the Glasgow & Clyde Valley Green Network in North Lanarkshire and other natural areas and green spaces that contribute to the health and quality of life of local communities will be required to satisfy the provisions of EDQ and PROT Policies. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		
W D & R T Hill (221) and supporting documents RD144-145, object to the proposed Special Landscape Area boundary at Castlehill Farm, Wishaw NLMW1179 (Map Book 13.5). Sandra McCumisky (236) objects to development of the natural environment at Proposed Housing Development Site 13/19 (Map Book 12.6). Amanda McConville (251) and Argyle (289) object to Policy PROM LOC 4. Scottish Government (255) objects to Policy PROM LOC 4 on the grounds that it does not reflect Scottish Planning Policy paragraph 212 "considerations of environmental benefits of National importance" and does not include wording to support Scottish Planning Policy (AD60) paragraph 229 requirement to "encourage temporary greening". Cumbernauld Village Community Council (270) objects to Policy PROM LOC 4 on the grounds that Cumbernauld Village's Langriggs, Jubilee Park and Springfield Park do not		

appear as local green areas on the map.

SNH (272) objects to Policy PROM LOC 4 on the following grounds:

- Beyond the identification of the six Delivery Areas (SDA) for the Green Network there is neither information on how they will be progressed, nor identification of local green priorities or opportunities. This is counter to Scottish Planning Policy paragraph 57.
- PROM LOC4 is not specifically labelled as a 'Policy'
- The use of the term "promote" within the policy for Special Landscape Areas is unclear.
- Although the Policy relates to the Special Landscape Areas, there is no reference to them by name in the associated guidance.

SEPA (273) objects to Policy PROM LOC 4 not highlighting the importance of integrated blue-green infrastructure.

CC Land Services Ltd (279) and supporting document RD243, objects to a site on Petersburn Road, Airdrie, being designated as part of the Green Network.

Modifications sought by those submitting representations:

W D & R T Hill (221) seek that the boundary of the Clyde Valley Special Landscape Area is reduced to ensure no encroachment into the Castlehill Farm Existing Housing Development Site NLMW1179.

Sandra McCumisky (236) seeks the retention of Proposed Housing Development Site 0013/19 as a green space in an already built-up area.

Amanda McConville (251) and Argyle (289) no modification submitted.

Scottish Government (255) seeks the following:

- The first paragraph of Category A2 National text should be amended to read: "Development that affects a Site of Special Scientific Interest will only be permitted where an appraisal has demonstrated the objectives of the designated area and the overall integrity of the area would not be compromised; or any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance."
- Policy PROM LOC 4 should be updated by inserting an additional paragraph along the following lines: "Temporary greening can be an appropriate way to create safe and attractive places until development comes on stream. The Council will support the use of temporary greening of land awaiting development, where appropriate. Consideration will be given to whether greening of a site could bring about a positive impact to the local environment and overall amenity of the area, without prejudicing the effectiveness and viability of the site, if it is allocated for development in the longer term."

Cumbernauld Village Community Council (270) suggests that Cumbernauld Village's Langriggs, Jubilee Park and Springfield Park are designated under Policy PROM LOC 4 local green sites.

SNH (272) seeks that further detail is provided on how each of the 6 Strategic Delivery Areas will be taken forward and that local green network priorities and opportunities for green infrastructure delivery at site level are identified as part of clearly stated site requirements in site briefs. Policy PROM LOC 4 should be reworded to reflect the wording of Scottish Planning Policy (AD60) paragraph 197 more clearly, as follows: "North Lanarkshire Council will promote understanding and awareness of the distinctive character and special qualities of the designated Special Landscape Areas and the enhancement and development of Seven Lochs Wetland Park and the Green Network as listed in Area Strategies".

Special Landscape Areas should be listed in the associated policy guidance.

The header on page 30 of the Policy Document be amended to read "PROM LOC 4 POLICY".

SEPA (273) recommends the inclusion of additional text highlighting the importance of integrated green - blue infrastructure.

CC Land Services Ltd (279) seeks the removal of the Green Network designation from land at Petersburn Road, Airdrie, whilst retaining it as part of the General Urban Area, so suitable for housing development.

Summary of response by planning authority:

W D & R T Hill (221) - The Council considers that the Statement of Importance (AD41) explains why the Clyde Valley has been proposed as a Special Landscape Area (SLA). Statement provides a framework and basis for proposed supplementary guidance linked to the Plan for protecting and enhancing the distinctive landscape character qualities and for managing change by development within proposed SLA designated area. The Council therefore disagrees that the boundary of the Clyde Valley Special Landscape Area should be changed.

Sandra McCumisky (236) - The Council considers that Proposed Housing Development Site 13/19 contributes to the wider regeneration and sustainable development of the local area and the delivery of South Wishaw Community Growth Area in line with the conclusions of the South Wishaw Mini-Charrette (AD26). The Council disagrees with the removal of Proposed Housing Development Site 13/19 from the Plan.

Amanda McConville (251) and Argyle (289) - Within the Plan's concept of broad Land Use Character Areas, indicating a wider sense of place there are a range of protections built into what is considered appropriate alternative uses. However, the Council also feels that it is important to recognise significant areas of open space within the urban area and how they link to the Green Belt and countryside beyond settlement boundaries. Policy PROM LOC 4 is the Council's Policy response to this issue.

Scottish Government (255) - The Council considers that Scottish Planning Policy (AD60) paragraph 212 is reflected in PROT A Guidance Category A2 National on page 37 of the Modified Proposed Plan. The Council agrees that "temporary use of unused or underused land as green infrastructure" has not been explicitly addressed in the Plan and will be dealt with under PROM LOC 1 Policy and Guidance.

Cumbernauld Village Community Council (270) - The Council considers that, as the areas

included in this submission are established existing greenspace features within the Village Conservation Area, as shown on Protect Map 4.5, they are sufficiently protected in the Plan. The Council therefore disagrees that they should be designated additionally as PROT A Category A4 Urban Green Network sites.

SNH (272) - The Council considers that the Background Paper on Green Network Opportunities (AD28) is the evidence base that supports North Lanarkshire's commitment to contribute to the delivery of the Central Scotland Green Network. The report explains that the six Strategic Delivery Areas (SDA) are developed by Clydeplan Strategic Development plan Authority to identify local priorities that could be delivered in these areas through Green Network delivery on land use opportunities in Local Development Plans. Since publishing the Plan, the Council has embarked on a blue print to identify spaces, places and connections between them in a network covering North Lanarkshire. It is the intention of the Council to form a Steering Group made up of key stakeholders, which will include SNH. The Council therefore disagrees that there is a need for additional detail to be included in the Plan in relation to the 6 Strategic Delivery Areas.

Should the Reporter find it acceptable, the Council would agree to the word "Policy" being added to the title bar between "LOC 4" and "Special…" on page 30.

Should the Reporter find it acceptable, the Council would agree to the enhancement of the wording of Policy PROM LOC4 by including the following additional text "North Lanarkshire Council will promote understanding and awareness of the distinctive character and special qualities of the designated Special Landscape Areas and the enhancement and development of Seven Lochs Wetland Park and the Green Network, as listed in Area Strategies."

The Council disagrees with naming specifically the Special Landscape Areas, as the Council may add further Special Landscape Areas within the Plan period that would then not be embedded within the Plan.

SEPA (273) - The Council agrees with SEPA and, should the Reporter find it acceptable, would propose that the following additional text be inserted into the PROM LOC 4 Guidance, with a consequential addition to the Glossary to read: "the importance of integrated blue-green infrastructure – green and blue features of the natural and built environment that are designed, integrated and managed to provide water management, access networks, habitat enhancement and open space functions. In so doing delivering economies of environmental, economic and social multi-functionality unique to and within a single place. Green features include parks, woodlands, trees, play spaces, allotments, community growing spaces, outdoor sports facilities, churchyards and cemeteries, swales, hedges, verges, green roofs and gardens. Blue features include rivers, lochs, wetlands, canals, ponds, porous paving and sustainable urban drainage systems. Paths, cycleways and river corridors provide connections through and between areas of green infrastructure."

CC Land Services Ltd (279) - The Council considers that this area of land is an important, planned landscape buffer between the original Dunrobin Primary School and the residential development on the eastern boundary of its football pitch. The development of the new re-positioned Hilltop Primary School on that former football pitch has amplified the role of this buffer and it would be detrimental to local amenity if it were to be developed as well. The objection shows that there is a need to retain the additional protection afforded by its designation as Urban Green Network. The Council disagrees

with the removal of this site from the Green Network.

Reporter's conclusions:

Special Landscape Area boundary at Castlehill Farm, Wishaw NLMW1179 (Map Book 13.5)

1. Paragraph 194 of Scottish Planning Policy sets an expectation that the planning system should facilitate positive change while maintaining and enhancing distinctive landscape character. Paragraph 197 of the same document sets out the purpose of areas of local landscape value, which should be to:

- "safeguard and enhance the character and quality of a landscape which is important or particularly valued locally or regionally; or
- promote understanding and awareness of the distinctive character and special qualities of local landscapes; or
- safeguard and promote important local settings for outdoor recreation and tourism."

2. The rationale for the designation of the Clyde Valley as a Special Landscape Area is set out in the Statement of Importance (AD41). It highlights that the Clyde Valley has been identified as an important and distinctive landscape over many years. It sets out the perceived value of the landscape both locally and in a regional context, and its importance both as part of a wider route and as a visitor destination. The document follows a recognised approach to identifying landscape designations including justification for boundary selection.

3. The Local Landscape Character Assessment Background Report (AD29) identified the Clyde Valley as very sensitive to development. It describes the value and key characteristics of the Clyde Valley as relating to the "limited settlement and overall impression of a well-cared for agricultural landscape." It notes that the landscape is highly sensitive to development, which does not relate to its agricultural character.

4. The Statement of Importance provides the rationale for the boundary of the Special Landscape Area: "Between Netherton and Gowkthrapple and from Gowkthrapple to Overton, the proposed boundary is further away from existing urban edge as substantial levels of development have not encroached on the valley edge but again the boundary is largely defined by a point where more level ground start to descend into the valley. The reason for this specific boundary is clear being that should future urban development or encroachment occur, the development will not overtop the valley and spill visually and physically down into the valley. If housing is proposed in these areas consideration will be required of both the shorter range views from within the valley and longer range views of the valley and valley edge from higher points above the valley on the South Lanarkshire side. Extensive buffer planting would be expected to be required to break up the impact of any development when viewed from these shorter and longer range visual receptors."

5. Policy PROM LOC4 would require any proposals that affect a Special Landscape Area to satisfy the provisions of all EDQ and PROT Policies. Policy PROT A establishes that for proposals potentially affecting Special Landscape Areas, permission will only be granted if it can be demonstrated to the council's satisfaction that there will be no adverse impact or that any impacts can be mitigated in environmental terms relevant to the impact. Thus, it does not set a complete moratorium against all development, but

development must not have an adverse impact.

6. I note that land adjacent to Castlehill Road benefits from planning permission in principle and the allocated site is included within the modified proposed plan. The representor has provided a masterplan for the site, which shows that there is an overlap between the boundary of the Special Landscape Area and the proposed site, including into areas identified for development within the masterplan.

7. The masterplan for the site is indicative only. Nevertheless, I see that much of the area that sits within the Special Landscape Area boundary is identified as green space or soft landscaping. A small area towards the western end of the site is identified for housing. Nevertheless, there are other areas within the wider site, outwith the boundary of the Special Landscape Area, which potentially could accommodate housing.

8. During my site inspection I saw that the boundary of the Special Landscape Area broadly follows the topography, sitting roughly at the break of slope from level ground towards the river valley. Nevertheless, there is variation both in the location of the break in slope and in ground levels above the break of slope, providing opportunities for development to be arranged to avoid encroachment into the valley or in more distant views.

9. I therefore conclude that the boundary of the Special Landscape Area has been determined following a systematic and objective assessment of landscape character. Whilst this boundary overlaps with an area for which planning permission in principle has been granted, policy PROT A allows for development within Special Landscape Areas, providing that adverse impacts can be avoided. The masterplan illustrates that there are opportunities to accommodate development without encroachment into the Special Landscape Area. The Statement of Importance and the Local Landscape Character Assessment Background Report provide information that can assist in defining what type of development may be permissible or guidance for suitable mitigation to avoid unacceptable environmental impacts. I therefore conclude that there is no need to modify the boundary of the Special Landscape Area.

<u>Land Adjacent to Woodhall Road, Newmains (Victoria Park) Site 13/19 (Map Book 12.6)</u>

10. Representations concerning this site are addressed as part of Issue 4.

<u>Scottish Government (255)</u>

11. The representation from the Scottish Government proposes two modifications in order to better reflect the requirements set out in Scottish Planning Policy paragraphs 212 and 229.

12. Paragraph 212 of Scottish Planning Policy relates to development that would affect areas subject to national designations, including Sites of Special Scientific Interest. This protection is addressed through policy PROT A on page 37 of the modified proposed plan, rather than policy PROM LOC4. The proposed modification appears to relate directly to the wording of policy PROT A. Indeed, the proposed text substantially duplicates the existing wording within row A2 of policy PROT A. As policy PROM LOC4 already states that proposals affecting certain green areas will be required to satisfy the provisions of all EDQ and PROT polices and policy PROT A addresses the point made in the representation, I see no need for the proposed modification.

13. The other proposed modification relates to temporary greening. Paragraph 229 of Scottish Planning Policy expects local development plans to encourage the temporary use of unused or underused land as green infrastructure, but notes that this will not prevent the realisation of any future development potential which has been identified. The council agrees that this has not been explicitly addressed within the plan. It has suggested that this would be dealt with under policy PROM LOC 1 (Regeneration Priorities). However, I can find no explicit mention of this requirement within that policy, nor a proposal as to how this requirement would be accommodated within that policy. I have therefore considered it here.

14. Policy PROM LOC4 seeks to protect and promote green networks, whilst the temporary greening of land promoted by paragraph 229 of Scottish Planning Policy is not designed to act as a barrier to future development of land. Nevertheless, paragraph 229 notes that temporary greening "may provide the advance structure planting to create the landscape framework for any future development." In that context, temporary greening could provide opportunities for long-term gains in and links between the green network. I therefore consider that it is appropriate for an additional paragraph to be added to the policy, setting out the benefits of temporary greening. Proposed wording for this is set out below.

Open spaces in Cumbernauld

15. The representation is seeking the identification of three locations within Cumbernauld as local green areas on the Protect Map 4.5.

16. Urban green network sites are identified under Policy PROT A. I note that two of the proposed locations are located within the conservation area and as such receive a degree of protection from development within the modified proposed plan. The third location is not apparently within the conservation area, nor has the council provided a specific comment about it.

17. I note that each of these areas are identified as 'community facilities' within the current local plan. I have been provided with no evidence to suggest that these areas do not continue to contribute to the quality of life in local communities. Indeed, the representation on behalf of the community council suggests that these areas continue to be valued by the local community.

18. Nevertheless, the preamble to policy PROM LOC4 (page 26) sets out that the policy is there to protect, promote and enhance certain green features which combine to form the Glasgow and the Clyde Valley green network. It does not seek to identify and protect each and every area of open space within settlement boundaries. I note that two of the proposed sites already benefit from some form of protection through their location within the conservation area and that all areas are established areas of greenspace. I have not been provided with evidence that any of these sites is subject to development. In the absence of information as to why the areas should be specifically identified as an urban green network site, I do not consider there is a need or justification to include them on the Protect map.

Modification to title and wording of policy

19. NatureScot (formerly SNH) has proposed that the word 'Policy' be inserted into the title box at the top of page 30 of the Modified Proposed Plan. I agree that this would be

consistent with the way in which all other policies within the modified proposed plan are presented. The council is also supportive of this modification. I therefore recommend that the wording should be modified accordingly.

20. The representation also proposes a modification to the wording of the policy to clarify the meaning of the word 'promote'. As I noted above, paragraph 197 of Scottish Planning Policy sets out three purposes of areas of local landscape value, including to promote understanding and awareness of the distinctive character and special qualities of local landscapes. In its response, the council has confirmed that it would be content that the wording of the policy be enhanced to confirm this context. I therefore recommend that the wording should be modified as set out below.

Naming of Special Landscape Areas

21. I have considered the suggestion that the Special Landscape Areas should be specifically listed by name within the associated guidance. The existing policy and guidance (which are to be amalgamated to create a single policy, as set out in issue 1) refer to some specific locations covered by the policy (Seven Lochs Wetland Park and the six Strategic Delivery Areas for the green network). However, it does not list either the Special Landscape Areas or each and every individual site identified as contributing to the green network. Likewise, I note that policy PROT A 'Natural Environment and Green Network Assets', which provides protection for sites of international, national, local and urban green network sites, does not list each and every site within each designation category.

22. Sites identified as contributing to the green network are marked on the Protect maps that accompany the modified proposed plan. Nevertheless, these maps do not distinguish between the different categories of land that contribute to the green network.

23. In response to representations in relation to Issue 07 Utilities Improvements, the council has provided a spatial framework for wind farm development. This is accompanied by a table, which identifies areas that receive high protection or where wind farm development may be acceptable. Group 2 of that table identifies Special Landscape Areas as areas of significant protection (in relation to wind farm development). It includes the names of the Special Landscape Areas within North Lanarkshire and refers the reader to the relevant pages of the map nook accompanying the modified proposed plan.

24. Given that the Special Landscape Areas are already specifically listed elsewhere within the modified proposed plan, I see no need to repeat them here. However, I propose that a cross-reference to the list of sites should be added and accordingly I have outlined this recommended modification below.

Progression of strategic delivery areas and green network priorities

25. I have also considered the representation seeking further detail about how each of the six strategic delivery areas will be taken forward and the request that local green network priorities and opportunities for green infrastructure delivery at the local level should be identified as site requirements in site briefs.

26. The appropriate level of detail that should be included within a local development plan is often subject to debate. The six strategic delivery areas will contribute to the wider Glasgow and the Clyde Valley green network, as set out in Clydeplan and hence to the

central Scotland green network, which forms one of the national developments within National Planning Framework 3. I note that the council has commenced work on 'The Green Network Blueprint', which is included within the proposed action programme for the modified proposed plan and that it intends to form a steering group of key stakeholders.

27. In addition, I note that green network opportunities are included within the area strategies and that a number of initiatives are also included within the proposed action programme.

28. Given that the modified proposed plan provides a clear commitment and framework for identifying areas where action will be taken and that a collaborative approach is likely to be required in order to maximise the benefits for the green network, I conclude that the level of detail within the modified proposed plan is acceptable.

Expansion of definition of green network

29. The representation is seeking acknowledgement of the importance of integrated blue-green infrastructure and confirmation of a broader definition of the green network to encompass 'blue' features.

30. The council accepts SEPA's proposed modification and has suggested including its proposed text verbatim. I also accept that 'blue' features contribute to the 'green' network and that this should be stated within the modified proposed plan. I therefore recommend that additional text should be added into the policy and the glossary, as set out below. Whilst my text draws heavily on that proposed by SEPA, I have modified this to fit with the surrounding text and aid clarity. The revised text is set out below.

Land at Petersburn Road, Airdrie

31. The representation seeks the removal of the green network designation which is proposed to be applied to the site, so that the land would be within the general urban area and not subject to specific protection.

32. This area of land provides landscape buffer between Hilltop Primary School and residential development to the east. The council has outlined that this is a planned landscape buffer and I have not been presented with any justification to demonstrate that this buffer is no longer required or not worthy of retention.

33. I find the green network designation is appropriate and no modification is required in response to this representation.

Additional objections

34. I note that there have been two additional objections to the policy, which do not state reasons for the objection.

35. "Protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment" is one of the principles that should be taken into account when assessing whether a proposal supports sustainable development, as set out in Scottish Planning Policy (paragraph 29). Policy PROM LOC4 is clearly aimed at achieving these aims. I therefore consider that it is an appropriate inclusion within the modified proposed plan.

Reporter's recommendations:

1. On page 30, the word 'Policy' should be inserted between 'PROM LOC4' and 'Special Landscape Areas…' in the first row of the top box. That is, the title box should read:

"PROM LOC4 POLICY Special Landscape Areas & Green Network Improvements."

2. On page 30, the wording within the 'white' portion of the Policy text box at the top of page, which reads "North Lanarkshire Council will ……Area Strategies" should be deleted and replaced by:

"North Lanarkshire Council will promote understanding and awareness of the distinctive character and special qualities of the designated Special Landscape Areas and the enhancement and development of Seven Lochs Wetland Park and the Green Network, as listed in Area Strategies."

3. In the PROM LOC4 Guidance box (and noting that this is to be incorporated into policy, as recommended in issue 1), the following text should be inserted after the first sentence ("Any proposals…..PROT Policies"):

"Special Landscape Areas are listed within Table 1 of Policy ID2."

4. The following text should be inserted into the PROM LOC4 Guidance box (and noting that this is to be incorporated into policy, as recommended in issue 1), after the penultimate paragraph which starts "It should be noted….." and before the final sentence in bold font:

"Temporary greening can be an appropriate way to create safe and attractive places until development comes on stream. The Council will support the use of temporary greening of unused or underused land as green infrastructure without prejudice to its future development potential being realised. appropriate. Consideration will be given to whether greening may provide advance structure planting to create the landscape framework for any future development."

5. The following text should be inserted into the PROM LOC 4 Guidance box (and noting that this is to be incorporated into policy, as recommended in issue 1), after the third paragraph commencing "Green Networks are…." and before the fourth paragraph commencing "Within North Lanarkshire…." The text should read:

"Integrated blue-green infrastructure – green and blue features of the natural and built environment that are designed, integrated and managed to provide water management, access networks, habitat enhancement and open space functions – is also important. Such infrastructure delivers economies of environmental, economic and social multi-functionality unique to and within a single place. Green features include parks, woodlands, trees, play spaces, allotments, community growing spaces, outdoor sports facilities, churchyards and cemeteries, swales, hedges, verges, green roofs and gardens. Blue features include rivers, lochs, wetlands, canals, ponds, porous paving and sustainable urban drainage systems. Paths, cycleways and river corridors provide connections through and between areas of green infrastructure."

6. The following text should be inserted into the Glossary after ICNIRP:

   "Integrated blue-green infrastructure - green and blue features of the natural and built environment that are designed, integrated and managed to provide water management, access networks, habitat enhancement and open space functions – is also important. Such infrastructure delivers economies of environmental, economic and social multi-functionality unique to and within a single place. Green features include parks, woodlands, trees, play spaces, allotments, community growing spaces, outdoor sports facilities, churchyards and cemeteries, swales, hedges, verges, green roofs and gardens. Blue features include rivers, lochs, wetlands, canals, ponds, porous paving and sustainable urban drainage systems. Paths, cycleways and river corridors provide connections through and between areas of green infrastructure."

Issue 006	**Transport Improvements**	
Development plan reference:	PROM ID1 Transport Improvements and Guidance Page 32	**Reporter:** Sue Bell
Body or person(s) submitting a representation raising the issue (including reference number):		
Sir Frank Mears Associates (261) Network Rail (274) Argyle (289) Woodlands Trust Scotland (293)		
Provision of the Development Plan to which the issue relates:	PROM ID1 Policy Transport Improvements North Lanarkshire Council Will support sustainable, multi-modal transport improvements identified and delivered through the measures listed, in accordance with the EDQ Policies in this Plan. PROM ID1 Guidance Current North Lanarkshire Transportation Strategy projects are listed in the Area strategies. All proposed development will be subject to assessment relevant legislation and all other Polices in the Plan.	
Planning authority's summary of the representation(s):		
Sir Frank Mears Associates (261) objects to Policy ID 1 as the land to the east of Biggar Road (SM003), which is part of a comprehensive masterplan, is not identified as transport improvements and opportunities as this would allow further expansion of the settlement. Network Rail (274) and supporting documents RD238-240, objects to the land at CfS/MIR Site 0033/05 Cadder Yard (SM027) not being designated as "Transport Improvements". Argyle (289) objects to Policy ID 1. Woodlands Trust Scotland (293) objects to Policy ID 1 on the grounds that the southern part of the Transportation Improvement Area, identified in the Northern Corridor Area north of NLSK1258, at Hornshill Farm Road, Stepps (Map Book 7.2), seems to overlap an area of woodland identified on the Ancient Woodland Inventory. Development would be contrary to Scottish Planning Policy and the Scottish Government's Policy on Control of Woodland Removal.		
Modifications sought by those submitting representations:		
Sir Frank Mears Associates (261) seeks the identification of land east of Biggar Road, Cleland (SM003), for transport improvements and opportunities. Network Rail (274) seeks the specific identification of CfS/MIR Site 0033/05 Cadder Yard (SM027) under Policy PROM ID1 Transport Improvements. Argyle (289) offered no suggested modification.		

Woodlands Trust Scotland (293) seeks the non-inclusion of the woodland area north of Existing Housing development Site NLSK1250 (Map Book 7.2) from the allocated site on the grounds of the presence of woodland identified on the Ancient Woodland Inventory and that it is specified that any development at this site would have to be located away from the woodland area, allowing for at least a 25m buffer. Woodlands Trust Scotland (293) can give relevant advice at the planning application stage.

Summary of response by planning authority:

Sir Frank Mears Associates (261) - Proposed Housing Development Site 09/19, 18a Biggar Road, Cleland, forms a small part of the south western corner of the objector's proposal. Proposed Housing Development Site 09/19 was allocated as a consequence of the Places for Business and Industry Charrette (AD30), whereby a number of small industrial and business uses not identified specifically within the hierarchy of Business Locations were designated as General Urban Area, allowing for flexibility in wholly or partially considering them as being suitable in principle for other uses, including housing. The Council considers that the partial inclusion of this site has been appropriately identified for development in principle.

The Council does not agree that the settlement boundary should be extended as proposed. Extending the settlement boundary in such a way would represent an illogical expansion of the General Urban Area into the countryside, with no identified need or demand.

Network Rail (274) - Cadder Yard is narrow, designated as Green Belt and also partially covered by a Site of Importance for Nature Conservation, Local Nature Reserve, and Community Park in the Modified Proposed Plan. These designations are no impediment to the continued use of the yard as rail sidings. There is no need to remove the site, and the whole of the rail network outwith the urban area by consequence, from the Green Belt.

Argyle (289) - Policy ID 1 is an enabling principle Policy that sets out the Council's commitment to promoting sustainable economic development, split into 3 broad categories of Transport and Utilities. This is approach is appropriate to meet the requirements of Scottish Planning Policy (AD60).

Woodlands Trust Scotland (293) - North Lanarkshire Local Plan Report of Examination Part 2 (AD54) page 223 – 225 recommended that this site be removed from the Green Belt and designated as a Motorway Service Area. The Modified Proposed Plan's Transport Improvement Area recognition continues to reflect this and its implementation is no longer a Development Plan matter. By the contributor's own admission, the matters raised in objection to the Transport Improvement Area can be resolved through the determination of any subsequent planning application.

Reporter's conclusions:

<u>Land East of Cleland</u>

1. The points raised in respect of land lying to the East of Cleland have been addressed by the council under a number of Issues. All these points are dealt with together as part of our response to Issue 16.

Cadder Yard

2. The modified proposed plan acknowledges the benefits of North Lanarkshire being located at the heart of major rail and road infrastructure. Policy PROM ID1 states support for sustainable, multi-modal transport improvements to be delivered through the strategic transport schemes and initiatives listed in the policy. These strategies are also included within Policy 17 of Clydeplan, which requires Transport Scotland, SPT and the Clydeplan local authorities to work together to deliver investment in the city region's transport network. Therefore, Policy PROM ID1 is consistent with Clydeplan.

3. The railway network forms an integral part of wider multi-modal transport strategies and hence gains support from Policy PROM ID1. The wording of the policy focuses upon support for strategic initiatives and does not list individual locations or safeguard named sites. Thus, I find it would be anomalous to include reference to the proposed site at Cadder Yard within the wording of the policy. To do so, when no other specific transport improvements are listed, would introduce an imbalance and bias within the policy.

4. During my site inspection I saw that construction works were in progress on the railway in the vicinity of the proposed site, suggesting there is no barrier to development.

5. I therefore conclude that no modifications to the modified proposed plan are necessary.

Argyle (289)

6. The representor has indicated that they object to the policy, but has not provided any supporting text to explain their reasons for this.

7. As I note above, the policy recognises the importance of transport in delivering various aspects of the modified proposed plan. It provides support for multi-modal transport improvements and strategic transport schemes and initiatives. This approach is consistent with Policy 17 (Promoting Sustainable Transport) of Clydeplan and Scottish Planning Policy. Therefore, I consider that the policy is appropriate and that no modifications are necessary.

Land at Hornshill Farm Road, Stepps (Map Book 7.2)

8. The suitability of the land for allocation as a motorway services station adjacent to the M80 was assessed during the examination of the North Lanarkshire Local Plan (AD 53 & AD54). That assessment took account of the presence of a Site of Importance for Nature Conservation along the Garnkirk Burn adjacent to the site's southern boundary, but did not find that this should preclude its allocation for the development of a motorway services area.

9. Scottish Planning Policy requires the planning system to protect and enhance ancient semi-natural woodland as an important and irreplaceable resource, together with other native or long-established woods, hedgerows and individual trees with high nature conservation or landscape value. Policy PROT A Natural Environment and Green Network Assets of the modified proposed plan provides for safeguarding of natural heritage interests. Ancient Woodland lies within Category 2 National designations for protection. In relation to ancient woodland, the policy notes that applicants should adhere to the Scottish Government's Control of Woodland Removal Policy with regard to any

development.

10. The degree of overlap between the allocated transportation opportunity site and the Site of Importance for Nature Conservation is relatively small and located to the south of the site. The representor has indicated that it could advise at application stage on measures to avoid adverse impact on the woodland, including identification of suitable buffer areas.

11. Given the location and extent of the woodland in relation to the site as a whole, and the protective policies in place for ancient woodland, I am content that the proposed use as a motorway service station can be accommodated without harm to the woodland and hence no modifications are required to the modified proposed plan.

Reporter's recommendations:

No modifications required.

Issue 007	**Utilities Improvements**	
Development plan reference:	PROM ID2 Utilities Improvements Policy, Categories and Guidance Pages 33 - 35	**Reporter:** Sue Bell
Body or person(s) submitting a representation raising the issue (including reference number):		
Rossco Properties (211) Scottish Government (255) Scottish Natural Heritage (SNH) (272) Scottish Environment Protection Agency (SEPA) (273) Nicky Miller (281) Axis (288) Argyle (289)		
Provision of the Development Plan to which the issue relates:	PROM ID2 POLICY Utilities Improvements North Lanarkshire Council will support utilities development in principle, subject to the assessment criteria listed in the Guidance below and consideration of other Policies in the Plan, and encourage the use of capacity from heat producing sources for heat networks identified through the National Heat Map. PROM ID2 Categories and Guidance Assessment Criteria for Utilities Development All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		
Rossco Properties (211) objects to Policy PROM ID 2 on the grounds that it does not provide policy support for the Energy from Waste Site with Planning Permission at Carnbroe, or include the fact the site has the ability to provide heating to development nearby through a District Heating Network. Scottish Government (255) objects to this policy for three reasons: 1. Scottish Planning Policy (AD60) paragraphs 295 and 296 require consideration of specific options when selecting sites and designing base stations and the setting out of matters to be addressed in planning applications for specific developments that support digital connectivity. The telecommunications section should be updated to fully reflect paragraphs 295 and 296 of Scottish Planning Policy (AD60). 2. Scottish Planning Policy (AD60) paragraph 161 states that Development Plans are required to indicate the minimum scale of onshore wind development that the spatial framework is intended to apply to the Policy should be updated to reflect this. SNH (272) makes the same objection, but does acknowledge that Policy ID 2 confirms that there are no Group 1 Areas within North Lanarkshire. Although reference is made to the North Lanarkshire Landscape Capacity Study for Wind Turbine Development (AD24) and associated development scales and criteria in the potential for and constraints on wind turbine, it is still considered not to be consistent with Scottish Planning Policy (AD60).		

3. Further consideration is required to demonstrate that any significant impacts on the qualities of the Areas of Significant Protections can be substantially overcome by siting, design or other mitigation, as stated in Scottish Planning Policy (AD60) Table 1 Group 2.

SEPA (273) objects to Policy PROM ID 2 on the grounds that to enabling the potential use of surplus heat for heat networks may impose a requirement on the Council to carefully consider the need for ensuring sufficient space is safeguarded for future pipework/pip-runs within areas set aside for development.

Nicky Miller (281) objects to Policy PROM ID 2 on the grounds that there is not enough investment in electric charging points and that there is an ever-increasing level of fly tipping on back roads.

Axis (288) objects to Policy PROM ID 2 context, waste management and the renewable energy context and policy wording.

The ”North Lanarkshire Context” on page 19 of North Lanarkshire Local Development Plan Modified Proposed Plan states that the Council supports the principle of sustainable renewable and low carbon energy and waste management development, but this has not been translated into the reasoned justification to Policy PROM ID 2.

Waste Management Context and Policy

There does not appear to be any context or justification for the waste management policy category in the Local Development Plan. This is not consistent with the requirements of Scottish Planning Policy and fails to provide a sound policy basis for the development or protection of essential waste management infrastructure.

The Map Book and associated Area Strategies fail to identify existing SEPA-licensed waste management facilities. FCC’s Greengairs Waste Management Complex is one of the most significantly and strategically important waste management facilities within North Lanarkshire, yet is not identified specifically, but just shown as countryside. Failure to identify this site and other licensed waste management facilities will lead to policy tensions between Policy PROM ID 2 and Policies PP 5 and AD 5. The in-principle acceptance of waste management development on a ”designated business centre within an appropriate development site” lacks clarity in context of Policy PROM LOC 2 and the emerging LDP’s approach to the allocation of business sites. Not all the sites listed in the industrial land supply will be suitable “in principle” for waste management development. As such, it is considered that the wording of this part of Policy ID 2 should be re-drafted to ensure that only existing or allocated business centres are deemed suitable and avoid the in-principle acceptance of potentially unsuitable industrial sites.

Renewable Energy Context and Policy Wording

The sole focus of this policy context in relation to Renewable Energy, as set out on page 31 of the Plan, and the specific criteria and requirements of Policy ID2 only appear to be in relation to onshore wind farm developments. There are numerous other forms of renewable energy generation that have been omitted. The Plan should support all forms of renewable energy development explicitly, in line with the requirements of national policy and guidance.

Argyle (289) objects to Policy PROM ID 2.

Modifications sought by those submitting representations:

Rossco Properties (211) seeks that the policy be amended to recognise that the site at Carnbroe has planning approval for an Energy from Waste facility. Furthermore, the Council should promote the fact that this EFW facility has the ability to provide heating to development nearby via a District Heating Network.

Scottish Government (255) seeks that:

1) The telecommunications section of the Policy should be updated to reflect Scottish Planning Policy paragraphs (AD60) 295 and 296 more fully.
2) The renewable energy section of the Policy should be updated to set out the minimum scale of wind development the spatial framework is intended to apply to.
3) The renewable energy section of the Policy should be clear about the circumstances in which wind farm development may be acceptable in areas of significant protection.

SNH (272) seeks that a Spatial Framework for onshore wind be included within the Plan, following the approach set out in Scottish Planning Policy (AD60) Table 1, page 39, with a map key reflecting the three Groups identified in Table 1; Group 1: Areas where wind farms will not be acceptable, Group 2: Areas of significant protection and Group 3: Areas with potential for wind farm development. The Spatial Framework should be complemented by a range of criteria that will be considered in deciding applications, taking account of those considerations set out in Scottish Planning Policy paragraph (AD60) 169.

A table similar to Scottish Planning Policy (AD60) Table 1 should accompany the Spatial Framework and be amended to reflect the local context for North Lanarkshire. This would point out that there are no Group 1: Areas where wind farms will not be acceptable (e.g. National Parks and National Scenic Areas). It should also provide details on national and international designations and any nationally important mapped environmental interests for Group 2: Areas of significant protection where wind farms may be appropriate in some circumstances and Group 3: Areas with potential for wind farm development subject to detailed consideration against identified policy criteria. For assistance with further consideration of Group 2; 'Other nationally important mapped environmental interests'.

SEPA (273) seeks the inclusion of extra text to strengthen the aims of the Policy.

Nicky Miller (281) seeks:

<u>Electric charging points</u>

There should be more charging points located in key areas such as retail parks and several at every station. This should increase exponentially with the amount that is being sold either in Scotland, or if possible, North Lanarkshire level. This should include rapid and slow charging.

<u>Fly-tipping</u>

The development of the Plan to resolve the issue of increasing and worsening levels of fly-tipping on backroads, especially between Greengairs and Plains and Dykehead Road,

Airdrie, east of the A73 toward Plains. Additional barriers to people being able to dispose of waste is contributing to fly-tipping.

Axis (288) seeks the following modifications to be made to the Plan, associated Proposals Map and relevant Area Strategy Plans/Development Schedules:

- Better emphasis for the support for sustainable renewable energy development and waste management development that is provided elsewhere in the Plan;
- Present an assessment of the Council's waste management needs and infrastructure requirements in the context of Scottish Planning Policy (AD60) paragraphs 178-187;
- Ensure that licensed waste management sites are explicitly identified within the Plan, on the Proposals Map and Area Strategy maps, to avoid conflict with Policies PP5/AD5 and to ensure that waste management sites are appropriately safeguarded.;
- Review the wording of the Plan to ensure that only appropriate sites within the industrial land supply benefit from an "in-principal" acceptance as a location for waste management development;
- That the reasoned justification to Policy ID 2 (Policy Document Page 31) and the policy wording in relation to renewable energy are re-drafted to take all forms of renewable energy development into account, rather than simply focussing on onshore wind farm developments.

It is also suggested that Policy PROM ID 2 is split to create a series of bespoke policies that specifically set out the policy requirements for renewable and low carbon energy projects, wind energy projects, waste management development and, if necessary, decentralised heat networks and the identification of potential networks.

Argyle (289) no modifications sought.

Summary of response by planning authority:

Rossco Properties (211) - The Council considers that this Policy does give sufficient support for waste sites, although it does not specifically refer to the Energy for Waste Site at Carnbroe in Policy ID 2. The Council acknowledges that this site has planning permission for an Energy from Waste site, but considers that there is no requirement to show this in the Plan. Should any changes to the terms of the status of any waste licence take place, the Plan would be rendered out-of-date and irrelevant. There is no requirement to promote that a District Heating Network can be run from this Energy for Waste Facility. Policy PROM ID 2 establishes that there are detailed criteria for assessing issues of need and impact specific to heat networks and waste developments. The Modified Proposed Plan contains policies that are supportive of the principle of renewable energy and waste development. The Council does not agree that this policy needs to be changed.

Scottish Government (255):

1) The Council agrees that the telecommunications section of this Policy should reflect the options and matters outlined in Scottish Planning Policy (AD60) Paragraphs 295 and 296. Should the Reporter be so minded the Council proposes to add the wording "as in line with the Scottish Planning Policy 2014" to this section on page 35 of the Plan. As Scottish Planning Policy (AD60) will be replaced before the Plan expires, the Council considers that adding paragraph numbers is not required.

2) The Council disagrees that a Spatial Framework for onshore wind should be produced and contained within the Plan. A Regional Onshore Wind Spatial Framework for Wind Energy Development (AD31) is embedded within Clydeplan Strategic Development Plan (AD60), which was examined by Reporters and Approved by Scottish Ministers in 2017, so there is no need to produce a separate Spatial Framework within the Plan. Also, at a more local level, there is the North Lanarkshire Landscape Capacity Study for Wind Turbine Development (AD24).

3) The Council considers that Policy PROT A is a blanket policy which covers all development. If development potentially affects an area of Significant Protection then this Policy would be triggered and, therefore, no further changes are required.

SNH (272) - North and South Lanarkshire Councils expressed a strong desire to develop a joint renewable landscape capacity study for onshore wind. SNH supported such a study to inform new Local Development Plans, but wished to expand the study to cover the wider Glasgow and Clyde Valley area, to support the Strategic Development Plan, and take cognisance of the generally strategic steer from the Scottish Government, reflected in Scottish Planning Policy 2014 (AD60) paragraph 161, with a series of individual sub-reports for each Local Authority area. The project, which was part-funded by SNH, was overseen by a steering group comprising Glasgow & Clyde Valley Strategic Development Plan Authority, SNH, and the eight constituent Clydeplan local authorities.

The Council considers that, given the Spatial Framework for onshore wind being embedded within Clydeplan, Approved by Scottish Ministers in 2017, there is no need to produce a separate Spatial Framework within the Plan. The Council therefore disagrees that PROM ID 2 Utilities Improvements should be amended in terms of Onshore Wind.

SEPA (273) - The Council considers that Policy EDQ 1 ensures that sufficient space is safeguarded for future pipework/pip-runs within areas set-aside for development. These issues would also be addressed when a planning application is received and assessed. In addition, should the Reporter be so minded, the Council is willing to add the following paragraph to Policy PROM LOC 4 ‘‘the importance of integrated blue-green infrastructure – green and blue features of the natural and built environment that are designed, integrated and managed to provide water management, access networks, habitat enhancement and open space functions. In so doing delivering economies of environmental, economic and social multi-functionality unique to and within a single place. Green features include parks, woodlands, trees, play spaces, allotments, community growing spaces, outdoor sports facilities, churchyards and cemeteries, swales, hedges, verges, green roofs and gardens. Blue features include rivers, lochs, wetlands, canals, ponds, porous paving and sustainable urban drainage systems. Paths, cycleways and river corridors provide connections through and between areas of green infrastructure.”

Nicky Miller (281) - Unfortunately, fly tipping is not a Development Plan matter. Policy EDQ 1 covers the potential for installation and operation of low and zero carbon generating technologies in new, refurbished or re-proposed buildings, with Policy PROM ID 2 giving guidance on vehicle charging points. The Council does not consider that this Policy needs to be changed.

Axis (288) - The Council does not think it is necessary to identify licensed waste management sites within the Plan, on the proposal map and area strategy maps. Should any changes take place to the terms of the status of any waste licence the document

would be rendered out-of-date and irrelevant.

The Council does not agree that the wording of the Plan requires a review to ensure that only appropriate sites within the industrial land supply benefit from an ”in-principle” acceptance as a location for waste management development as each development is subject to the assessment criteria listed in the guidance section of PROM ID2 Categories & Guidance. For instance, there could be sites outwith the industrial land supply that could be more suitable for waste management development.

The Council agrees that the wording in relation to the renewable energy should be altered to take into account all forms of renewable energy. Should the Reporter find it acceptable, the Council proposes to add the following wording to the Renewable Energy section on page 31 ”support to be given, where appropriate, to alternative renewable technologies and associated infrastructure”.

Policy PROM ID 2 establishes that there are detailed criteria for assessing any forthcoming applications for renewable and low carbon energy projects and the other categories raised, as such the Council does not agree that a series of bespoke policies is required.

Argyle (289) - Scottish Planning Policy requires land use planning to promote sustainable development. By consequence, this has to encompass transport improvements and the development and installation of various strands of infrastructure required to generate and transport power and technology. Policy PROM ID 2 expresses legitimately how the Council considers that these matters should be planned for and what should be taken into account in assessing any developments of this type that may arise from time-to-time.

Reporter’s conclusions:

<u>Rossco Properties (211)</u>

1. The representation seeks explicit policy support for a consented energy for waste site and recognition that the facility has the ability to contribute to a district heating network.

2. Policy PROM ID2 sets out generic guidance and support for a range of utilities. This includes clear support for both energy from waste projects and heat networks. As such, I am content that it would not be appropriate to include specific sites within a policy that addresses the principles of waste management, including energy from waste proposals.

3. Sites that have been or could be developed for specific purposes are set out elsewhere in the modified proposed plan, including in the area strategies. In the case of the site raised in the representation (Carnbroe), I note that this is clearly identified within the Coatbridge Local Area Partnership area strategy, under the heading: “Potential Heat Energy Network Sources” as an energy from waste site. I see this as a clear acknowledgement by the council of the role that this site can play in supporting a district heating network.

4. In conclusion, I do not consider that it would be appropriate to include the details of a single site within a policy that sets out the general principle of support for energy from waste and heat networks. I am content that the potential role of the specific site is adequately acknowledged elsewhere within the modified proposed plan. Therefore, no modifications are required.

Telecommunications

5. Scottish Planning Policy states that local development plans should provide a consistent basis for decision-making in relation to communications equipment. Paragraphs 295 and 296 list specific factors that should be addressed when selecting sites and designing base stations or when considering applications for specific developments.

6. As worded, the telecommunications section of policy PROM ID 2 encapsulates some of the concepts set out in paragraph 295, but does not explicitly list all the design criteria or matters to be addressed in planning applications as set out in paragraphs 295 and 296.

7. The council has accepted that the policy should be aligned with the matters set out in Scottish Planning Policy. It has therefore proposed a modification, which refers to "Scottish Planning Policy 2014", but has suggested that there is no need to include a reference to specific paragraph numbers as the document will be replaced before the modified proposed plan expires. I am not persuaded by this suggestion. The relevant paragraphs are an integral part of the document, which is the current statement of planning policy in Scotland. These paragraph numbers would only become obsolete if/when Scottish Planning Policy is updated or replaced. In that event, the reference to 'Scottish Planning Policy 2014' would also be obsolete. In addition, the council's comments seem inconsistent with its proposed approach elsewhere in the modified proposed plan (see below), where its proposed modifications include reference to specific paragraphs within Scottish Planning Policy. I therefore conclude that there is no reason why a reference to Scottish Planning Policy should not also be accompanied by a reference to the specific relevant paragraphs of that document.

8. I therefore propose that the wording of the policy should be modified by reference to the relevant paragraph numbers within Scottish Planning Policy. These references are unaffected by the amendments to Scottish Planning Policy which were published in December 2020. Precise wording for this is set out below.

Renewable Energy - wind energy

9. Scottish Planning Policy in respect of onshore wind developments is set out in paragraphs 161 – 166 of Scottish Planning Policy. It requires that development plans should include a spatial framework identifying those areas that are likely to be most appropriate for onshore wind farms and that these should indicate the minimum scale of onshore wind development that the framework applies to. The spatial framework should use the approach set out in table 1 of Scottish Planning Policy, which identifies three types of area: group 1 – areas where wind farms will not be acceptable; group 2 – areas of significant protection; and group 3 – areas with potential for wind farm development. In addition, development plans should set out the criteria that will be considered in deciding applications of different scales, including extensions and re-powering. In developing these criteria, councils should be aware of the considerations set out in paragraph 169 of Scottish Planning Policy.

10. Both strategic and local development planning authorities are expected to identify where there is strategic capacity for wind development. Strategic development planning authorities are expected to take the lead in co-ordinating cross-boundary elements. The relevant strategic plan for North Lanarkshire is Clydeplan. Diagram 6 of Clydeplan

comprises an onshore wind spatial framework for the region. The diagram is at a large scale and lacks geographical markers including local authority boundaries and is intended to be indicative only.

11. The text in support of diagram 6 is clear that there is an expectation that the spatial framework boundaries would be further refined within local development plans. This is explicitly stated in policy 10 of Clydeplan:

"In order to support onshore wind farms, Local Development Plans should finalise the detailed spatial framework for onshore wind for their areas in accordance with SPP, confirming which scale of development it relates to and the separation distances around settlements. Local Development Plans should also set out the considerations which will apply to proposals for wind energy development, including landscape capacity and impacts on communities and natural heritage. Proposals should accord with the spatial framework set out in Diagram 6 and finalised in Local Development Plans."

12. The Modified Proposed Plan does not include a refined spatial framework or any clarification of the position of the boundary of areas with potential for wind energy development. I do not accept the council's position that as Clydeplan includes a spatial framework, there is no need for one to be included within the modified proposed plan. As noted above, policy 10 of Clydeplan explicitly expects that local development plans should finalise the detailed spatial framework.

13. I am also not persuaded by the council's reference to the 'North Lanarkshire Landscape Capacity Study for Wind Turbine Development' as justification for not producing a spatial framework. This document, which is also referenced within policy PROM ID2, identifies landscape character areas across North Lanarkshire and assesses the sensitivity of these to turbines of different heights. Whilst the sensitivity of areas to turbines may help to inform a spatial framework, it does not, on its own, represent that framework. In addition, the capacity study does not form part of the development plan. The inset 2 map included within the modified proposed plan mapbook does provide a broad scale indication of the location of different landscape character areas, but again does not directly provide a spatial framework for the location of wind turbines.

14. Even if I were to accept that a spatial framework map is not required, Scottish Planning Policy (and Clydeplan policy 10) still requires local development plans to provide for local variation in scale of development that the spatial framework applies to and separation distances around settlements. Whilst policy PROM ID2 of the modified proposed plan gives some indication of the size of turbines to which the policy applies (ground to tip heights from 15m - >120 m), and notes that sensitivity for wind turbine development will vary depending on proximity to receptors (including people), it makes no specific mention of the separation distances around settlements that would be applied.

15. Nor is it obvious from policy 10 in Clydeplan what separation distances would be applied. Indeed, Clydeplan states at page 64: "Local Development Plans, in confirming the detailed boundaries of these areas, may indicate lesser separation distances from settlements to reflect local circumstances. In these areas wind energy developments will only be acceptable if they can demonstrate that any significant effects on the qualities of the area can be substantially overcome by siting, design or other mitigation." I can see no mention in the modified proposed plan of whether the distances used in Clydeplan (which in turn are not stated within policy 10) or some other distance is being applied, and how this relates to the proposed community separation of up to 2 km around settlements

in areas of significant protection as set out in table 1 of Scottish Planning Policy.

16. In addition, paragraph 169 of Scottish Planning Policy sets out those factors that should be considered when determining an application for a wind farm. These aspects are not referenced in PROM ID2, nor does the policy make reference to how applications for extensions or re-powering will be considered, as required by paragraph 161 of Scottish Planning Policy.

17. I issued a further information request to the council seeking further information and clarification in relation to the points above. In particular, I sought details about the proposed spatial framework for wind development, the scale of development that the framework applies to; separation distances around settlements; and the criteria that would be assessed in considering applications.

18. In response, the council has stated that it had considered that the information was available in other formats within the plan. It has referred to policies PROT A and PROT B, which it considers are consistent with the principles of protection set out in table 1 of Scottish Planning Policy. It has also confirmed its view that there should be a strategic development plan partnership approach. Nevertheless, it has proposed some minor alterations to policy ID2 guidance and a significant rewrite of policy ID2 Category Renewable Energy guidance to bring these points together in one place. The proposed text includes a table, based on the groups defined in table 1 of Scottish Planning Policy and two additional inset maps, to provide spatial representations of the items set out in the table.

19. The proposed replacement text for onshore wind energy sets out the context for the spatial framework. It refers to the strategic partnership approach taken through Clydeplan, in identifying areas with capacity for wind farm development. It further refers to 'The Landscape Capacity Study for Wind Turbine Development in Glasgow and the Clyde Valley', which covered North Lanarkshire and was used to inform the spatial framework included in Clydeplan and the modified proposed plan.

20. Further detail of the proposed spatial framework is set out in a table, which follows the approach set out in paragraph 161 and table 1 of Scottish Planning Policy, including the definition of a community separation distance for consideration of visual impact. The proposed text also includes details of the minimum scale of development to which the framework applies.

21. I accept that there is a clear logic in basing the spatial framework on the same supporting landscape document as that used for Clydeplan. This ensures that there is a consistent consideration of cross-boundary constraints and opportunities, in line with the requirements of paragraph 162 of Scottish Planning Policy.

22. Paragraph 169 of Scottish Planning Policy sets out those considerations that should be assessed when determining an application for energy infrastructure projects. PROM ID2 as drafted, does not cover all these aspects.

23. In response to my further information request the council has confirmed that the modified proposed plan should be read in full. Policy PROM ID states that reference should be made to all policies of the plan and the EDQ policies in particular. The reason for this approach is to avoid the need to repeat the same lists of criteria throughout the plan.

24. I accept that the council's proposed approach can help to avoid repetition within the plan. Nevertheless, in order for such an approach to be valid, it is important that the list of criteria, wherever it appears, should contain all aspects of relevance to decision making. Whilst policy EDQ1 contains many of the bullet points set out in paragraph 169 of Scottish Planning Policy, there are some omissions. To address this, the council has proposed a modification to the assessment criteria guidance for renewable energy on page 34 of the plan and to the criteria listed under policy EDQ1 on page 84 of the plan. I am content that these modifications would encapsulate the points listed within paragraph 169 of Scottish Planning Policy, subject to revisions to the council's proposed wording to reflect that paragraph 169 of Scottish Planning Policy lists considerations, rather than criteria to be satisfied.

25. The modified text proposed by the council refers to "The Landscape Capacity Study for Wind Turbine Development in Glasgow and the Clyde Valley – North Lanarkshire" and how this has informed inset maps 2, 4 and 5 within the map book accompanying the modified proposed plan. On inspection, I found that the title of the landscape character areas shown on the inset maps did not directly mirror the titles of the landscape character areas used within the landscape capacity study. I find that this could lead to potential confusion or mis-understanding about the application of the policy.

26. Following my further information request, the council has provided updated inset maps, which utilise the same terminology for each landscape character area as is used in the landscape capacity study.

27. In conclusion, whilst the council's proposed text refers to a "spatial strategy" rather than a "spatial framework", I find that it addresses the shortfalls that I identified above and provides the information and detail as required by Scottish Planning Policy and the confirmation of key points required by Clydeplan policy 10. Therefore, with the substitution of the term "spatial framework" for "spatial strategy", and the inclusion of the updated inset maps 2, 3 and 5, which use the same landscape descriptors as the Landscape Background Report, I accept the council's proposed replacement text. This is set out below.

<u>Renewable Energy – scope of policy</u>

28. Achieving 'A low carbon place' is one of the stated outcomes of Scottish Planning Policy. The Scottish Government is committed to reducing carbon emissions and adapting to climate change. The Climate Change (Scotland) Act 2009 and amendments have set increasingly strict targets for reducing greenhouse gas emissions.

29. National Planning Framework 3 supports diversification of the energy sector to assist in the transition to a low carbon economy. There are several established and innovative low carbon generating technologies available, but the supporting text for renewable energy within PROM ID2 lists criteria that are specific to onshore wind farm developments only.

30. Through a further information request, I sought further clarification from the council about the intended scope of the policy. It has confirmed that the policy is intended to apply to all forms of renewable energy generation development. It has noted that such developments would be subject to all policies within the modified proposed plan, including the EDQ policies. As part of its proposed revision of the guidance in relation to wind farm development, which I discussed above, the council has proposed additional wording to

clarify that it applies to all forms of renewable energy generation.

31. To be consistent with national policy, I find that the policy wording should be modified to allow for and encourage all forms of renewable energy. I am also content that the modifications to policy EDQ 1 set out above would also apply to any form of renewable energy development that comes forward and hence would satisfy the requirements of Scottish Planning Policy.

Heat networks and pipe runs

32. The representation seeks a strengthening of the policy by reference to the need to safeguard for future pipework/pipe-runs associated with heat networks.

33. National planning policy in relation to heat is set out in paragraphs 158 – 160 of Scottish Planning Policy. Paragraph 159 expects local development plans to support the development of heat networks in as many locations as possible. It also requires that policies should support the safeguarding of piperuns within developments for later connection and pipework to the curtilage of development. Policies should also give consideration to the provision of energy centres within new development.

34. Policy PROM ID2 encourages the use of capacity from heat producing sources for heat networks identified through the national heat map. In relation to specific criteria for assessment of heat networks, the policy encourages co-location of existing/proposed energy sources with high demand energy users. Thus, the policy encapsulates the general support for heat networks, in line with Scottish Planning Policy.

35. In addition to the specific criteria for utilities improvement set out in policy PROM ID2, all development must satisfy the criteria set out in policy EDQ 1. I note that the matters that are to be assessed under policy EDQ 1 include (amongst other items):

- Public utilities e.g. underground services (including the fibre network), drainage systems, overhead power lines;
- The potential for and benefits of co-location with existing/proposed energy/heat sources;
- The potential for installation and operation of low and zero-carbon generating technologies in new, refurbished or re-purposed buildings.

36. Whilst these items do not expressly refer to pipe-runs, I consider that such considerations are implicit within the stated need to consider public utilities such as underground services and the potential for co-location with existing or proposed energy/ heat sources. To list each and every potential service could make the policy unwieldly. As phrased, I consider it adequate to meet the requirements of paragraph 159 of Scottish Planning Policy, as set out above. Therefore, no modification is required.

Electric charging points

37. Paragraph 275 of Scottish Planning Policy states that development plans should support the provision of infrastructure necessary to support positive changes in transport technologies, such as charging points for electric vehicles. Paragraph 289 of the same document also requires that electric vehicle charge points should always be considered as part of any new development and provided where appropriate.

38. Policy EDQ 1 lists those factors that need to be assessed for all developments. One of these criteria relates to the potential for installation and operation of low and zero-carbon generating technologies in new, refurbished or re-purposed buildings. Whilst electric charging points are not specifically listed, I consider that they would be included within the scope of this criterion.

39. Vehicle charging points are, however, specifically listed within Policy PROM ID2, which identifies additional criteria for the assessment of proposals.

40. I am therefore content that the modified proposed plan provides support for charging points for electric vehicles and that no modifications are required.

Fly tipping

41. I acknowledge the concerns raised by the representor, which relate to the level and location of fly tipping. Nevertheless, as the council has noted, these are not matters that are required to be addressed within the local development plan.

Policy context

42. The representation questions whether the text on page 31 of the modified proposed plan provides sufficient context to the policy wording in policy PROM ID2.

43. The purpose of the 'promote' policies, as set out on page 11 of the modified proposed plan, is to promote development locations and infrastructure to contribute to successful, sustainable places.

44. Policy PROM ID2 addresses promotion of a broad range of infrastructure, required to contribute to successful, sustainable places. This includes policy provision in relation to waste.

45. I acknowledge that the introductory text to policy PROM ID2 set out on page 31 is 'unbalanced' in that it provides clear contextual paragraphs relating to transport and renewable energy, but provides scant background to other elements of the policy such as waste and heat. Nevertheless, the modified proposed plan as a whole does set out the contextual information for waste management. Indeed, the representation refers to other areas of the plan, which it considers offers clear support for infrastructure development and the policy context in relation to waste management and renewable/low carbon energy development. The representation refers, in particular, to page 19 of the plan, which it considers overtly supports the principle of sustainable renewable and low carbon energy development and waste management development.

46. Thus, there is no suggestion that the modified proposed plan lacks support for waste, but the disparate presentation of this information throughout the modified proposed plan acts to dilute the link between need and policy provision.

47. Planning circular 6/2013 provides guidance on development planning. Paragraphs 105 – 125 address the role of reporters in carrying out an examination of a proposed plan. Paragraph 117 is clear that Ministers intend the reporter primarily to examine the appropriateness and sufficiency of the content of the proposed plan. They are not tasked with making the plan as good as it can be. Thus, whilst I accept that further text on page 31 might aid in providing a more detailed policy context, I do not find

that its absence makes the plan either deficient or inappropriate. When considered in the round, the modified proposed plan contains the necessary information and hence no modification is required.

Waste management context and policy wording

48. The representation questions whether the approach taken for waste management is consistent with the requirements of Scottish Planning Policy. The representor considers that the council must properly understand and plan for the needs of the area including the required facilities for different waste streams that deliver different types of waste management. In their view the plan, as drafted, fails to do this.

49. The expectations of Scottish Planning Policy in respect of planning for zero waste, are set out in paragraphs 175 – 187. In summary, development plans should:

- give effect to the aims of the Zero Waste Plan and promote the waste hierarchy;
- promote resource efficiency and the minimisation of waste during construction and operation of new developments;
- enable investment opportunities in a range of technologies and industries to maximise the value of secondary resources and waste to the economy;
- safeguard existing waste management installations and ensure that the allocation of land on adjacent sites does not compromise waste handling operations;
- identify appropriate locations for new infrastructure; and
- identify where masterplans or development briefs will be required to guide the development of waste installations for major sites.

50. I find there to be some inconsistencies between the summary of these paragraphs set out in the representation, and the precise terms of Scottish Planning Policy. For example, whilst a clear understanding of waste management requirements might be helpful, I can see no specific requirement to quantify waste streams listed within Scottish Planning Policy. I further note that Clydeplan has assessed that there is adequate capacity within existing and approved landfill sites within the city region to meet the ten-year rolling capacity for landfill set by the Scottish Government.

51. In addition, the policy sets out clear support for the delivery of the zero waste plan objectives. The modified proposed plan as a whole promotes resource efficiency in the construction and operation of developments and through the promotion of heat networks. It allows for investment in a range of technologies and industries and for the safeguarding of existing facilities and identifies broad locations where new infrastructure can be located. I therefore consider that the modified proposed plan does comply with the requirements of Scottish Planning Policy.

52. I have considered the suggestion that failure to mark existing SEPA licensed waste management facilities on the proposals maps and area strategies could lead to conflict with policy PP 5, particularly in relation to Greengairs.

53. Policy PROM ID2 sets out criteria for sites where waste developments may be supported, but it does not aim to identify each and every location where such development may be acceptable. Adding existing SEPA licensed sites to the modified proposed plan would represent a snapshot in time. There would be no mechanism for keeping the list of sites updated, in line with SEPA licensing arrangements. By contrast, SEPA maintains a register of licensed sites, which is publicly accessible. In relation to

Greengairs, I note that waste functions at this site are specifically listed in the modified proposed plan within the area strategy for Airdrie.

54. In addition, policy PROM ID2 does not introduce any form of guarantee that all or any proposals for waste development on sites licensed by SEPA would be acceptable, wherever those sites are located. Conversely, whilst policy PP 5 sets out to ensure that developments within the countryside are appropriate to their setting, I can see nothing in the policy that would automatically prevent or preclude expansion or diversification of an existing waste site, provided it met all other criteria.

55. For these reasons, I do not consider that it is necessary to include all SEPA licenced sites on the proposal and area strategy maps.

Locational guidance for waste management sites

56. Policy PROM ID2 identifies three broad locations where waste developments may be acceptable. This includes "a Business Centre within an appropriate development site". I note that the representation is particularly concerned that not all sites listed within the industrial and business land supply, may be suitable 'in principle' for waste management development.

57. Whilst the policy identifies "a designated Business Centre within an appropriate development site" as a potentially suitable location for waste developments, this is not the only criterion that a site would need to satisfy in order to be acceptable. Other assessment criteria for utilities development are listed within the policy. In particular, it notes that all planning applications will be assessed for their suitability for being located in the land use character areas in which they are proposed in terms of environmental qualities, as required by the EDQ policies of the modified proposed plan.

58. The policy in respect of allocation of land for business and industrial purposes is set out in PROM LOC 2, which includes sites for specific uses. Further guidance as to the uses deemed appropriate for each of the categories of business development sites is set out in the 'purpose of place' policies; PP 2A, PP 2B; and PP 2C.

59. In determining applications, both policy PROM ID2 and PROM LOC 2 note that a proposed development will be subject to assessment against relevant legislation and all other policies in the plan.

60. When considered together, I do not consider that the policy, as worded, lacks clarity in the context of policy PROM LOC 2, nor do I find that it sets a presumption for permission 'in principle' for waste management on sites which may not be suitable for that use. Therefore, no modification is required.

Other representations

61. I note the objection to the policy made by Argyle (289). As the representor has not provided any supporting comments, I am unclear as to whether the objection relates to the policy as a whole, or particular aspects of it. However, it is appropriate for the modified proposed plan to make provision for utilities in support of development. Subject to my comments above and proposed modifications below, I am content that the policy is consistent with the requirements of Scottish Planning Policy.

62. The comments raised by NatureScot (formerly Scottish Natural Heritage) in relation to the potential confusion between the use of the terms 'landscape character area' and 'land use character area' have been addressed as part of issue 22.

Reporter's recommendations:

Telecommunications

1. On page 35 of the Modified Proposed Plan, in relation to PROM ID2 Categories and Guidance, Telecommunications, in the right hand column delete the third paragraph and bullet points which commence "The Council will encourage…. and replace it with:

> "The Council will encourage telecommunications proposals that are in line with paragraphs 295 and 296 of Scottish Planning Policy and that:
> Share existing and new facilities, or use existing buildings or structures
> Are sited and designed to reduce visual and environmental impact.

Renewable Energy

2. On page 34 of the Modified Proposed Plan, in relation to PROM ID2 Categories and Guidance, Renewable Energy, delete all the text in the right hand box and replace with the following:

> **"Renewable Energy**
>
> The Council recognises that there is a range of means of generating renewable energy and will support, where appropriate, alternative technologies and associated infrastructure, subject to assessment against relevant legislation and all other Policies in the Plan. Planning Applications will be assessed for their suitability for being located in the Land Use Character Area in which they are proposed in terms of specific protection and environmental qualities, as required by the PROT and EDQ Policies of this Plan in particular. Proposals for renewable energy development must have regard to the considerations set out in Scottish Planning Policy paragraph 169.
>
> An assessment of the impact of proposed renewable energy generation development on features affected by the **Protecting Assets Policies Categories A1, A2, A3, B1 and B2,** in particular the integrity of World Heritage Sites, Natura 2000 sites, Historic Battlefield and peatlands, as well as more local considerations, should seek to address issues of scale, amenity, cumulative impact, community benefit and restoration.
>
> The Council will seek removal of operationally redundant generating equipment through a decommissioning process and the restoration of the location to the Council's satisfaction, through planning conditions.
>
> **Onshore Wind Energy**
>
> A Regional Onshore Wind Spatial Framework for Wind Energy Development, was Approved as part of the Clydeplan Strategic Development Plan. To protect communities and internationally and nationally important environmental designations and resources, this identifies all areas outwith those with significant protection specified above that may have potential for wind farm development.

The Landscape Capacity Study for Wind Turbine Development in Glasgow and the Clyde Valley – North Lanarkshire identifies landscape character areas across North Lanarkshire. The resultant spatial strategy is represented by Inset Maps 2, 4 and 5 shown in the Local Development Plan Map Book.

The table below entitled "Scottish Planning Policy Spatial Framework Requirements – North Lanarkshire" is presented in compliance with Scottish Planning Policy Table 1, along with the Inset maps mentioned above.

Scottish Planning Policy Spatial Framework Requirements – North Lanarkshire			
Group	**Description**	**Constraints defined by Scottish Planning Policy**	**Constraints that apply to the North Lanarkshire Local Development Plan Area as shown on Insets 4 & 5 (Map Book pages)**
Group 1	Areas where wind farms will not be acceptable	National Parks and National Scenic Areas	N/A but Policy PROT A Category A2 allows for protection if any are designated in the future.
Group 2	Areas of significant protection	World Heritage Sites	Frontiers of the Roman Empire – Antonine Wall Policy PROT B Category B1 (3.4, 3.5, 4.2, 4.3, 4.4 & 4.5)
		Natura 2000 and Ramsar	<u>Special Protection Area</u> Policy PROT A Category A1. Slamannan Plateau (4.6, 5.5, 5.6, 6.5 & 6.6) <u>Special Areas of Conservation</u> Policy PROT A Category A1. West Fannyside Moss (5.5 & 5.6) Black Loch Moss (7.7) North Shotts Moss (10.7) Clyde Valley Woods (13.6 & 14.6)
		Sites of Special Scientific Interest	<u>Sites of Special Scientitfic Interst</u> Policy PROT A Category A2. Corrie Burn (3.3) Dullatur Marsh (3.4,3.5 & 4.4) Slamannan Plateau (4.6, 5.5, 5.6, 6.5 & 6.6) West Fannyside Moss (5.5 & 5.6) Mollinsburn Road Cutting (6.3) North Bellstane Plantation (6.4 & 6.5) Longriggend Moss (7.6)

				Black Loch Moss (7.7) Woodend Loch (8.3) Lady Bell's Moss (pages 8.6 & 9.6) Hassockrigg and North Shotts Mosses (9.7 & 10.7) Hamilton Low Parks (11.3,11.4 &12.4) Garrion Gill (13.6 & 14.6) **Bishop Loch* (*Glasgow City Council area, but adjacent to North Lanarkshire Council Area)	
			Special Landscape Areas	Kilsyth Hills and Clyde Valley Special Landscape Areas. Policy PROT A Category A3. (1.3, 1.4, 2.2, 2.3, 2.4, 2.5, 3.2, 3.3, 3.4 & 3.5 and 12.4, 12.5, 13.4, 13.4, 14.5 & 14.6)	
			National Nature Reserves	N/A, but Policy PROT A Category A2 allows for protection if any are designated in the future.	
			Gardens and Designed Landscapes	Gardens and Designed Landscapes N/A, but Policy PROT B Category B2 allows for protection if any are designated in the future	
			Inventory of Historic Battlefields	Kilsyth Historic Battlefield (3.4, 3.5, 4.4 & 4.5) Policy PROT B Category B2	
			Areas of Wild Land	N/A	
			Carbon rich soils, deep peat and priority peatland habitats	Areas of carbon and peatland classes 1 and 2, as defined on the National Carbon and Peatland Map produced by NatureScot, and specified as part of Landscape Character Areas 18 and 20 in Landscape Capacity Study for Wind Turbine Development in Glasgow and the Clyde Valley - North Lanarkshire.	

		An area not exceeding 2km around cities, towns and villages identified on the Local Development Plan with an identified settlement envelope	An indicative area of 2km has been drawn around the urban area of North Lanarkshire and shown on Inset 5 in the Map Book.
Group 3	Areas with potential for wind energy development	No constraints defined by Scottish Planning Policy, equating to the area identified in Clydeplan Strategic Development Plan as a search area for wind farm development within North Lanarkshire. Notwithstanding, all such proposals subject to detailed consideration against all relevant legislation and Policies of the Plan and Policy ID2 Guidance - Renewable Energy.	

It should be noted that the indicative area of 2km drawn around the urban area represents an area within which special consideration is required with respect to visual impact on communities. The actual extent of the area for consideration will depend on local topography, landscape character and the layout and built form. It is the responsibility of the developer to verify detailed boundaries in relation to the constraints identified on these maps.

"The Landscape Capacity Study for Wind Turbine Development in Glasgow and the Clyde Valley – North Lanarkshire" sets the minimum scale of development that the Council's strategy considers as single turbines of 15m ground-to-tip height and defines a wind farm as consisting of 6 or more single turbines.

The sensitivity for wind turbine development varies depending upon.
• Proximity to receptors (people)
• Levels of intervisibility
• Sensitivities of adjacent landscapes.

In addition, for each of these defined landscape character areas, Table 6.1 of Landscape Capacity Study for Wind Turbine Development in Glasgow and the Clyde Valley - North Lanarkshire, describes the potential for and constraints on wind turbine development, of all scales, in terms of:
• sensitivity of each landscape area to wind turbine development
• capacity for different heights of turbines
• capacity for different numbers of turbines
• cumulative development impact
• visual impact and
• potential community benefit."

3. On page 2 of the Map Book, Inset 2 should be replaced with the updated Inset 2, which uses the same landscape descriptors as those used in the 'Landscape Capacity Study Wind Turbine Background Report' (AD24).

4. In the Map Book, two new maps should be inserted after Inset 3, as provided by the

council on 9 March 2021 in its second response to further information request 15. These are Inset 4 Wind Energy Constraints Map and Inset 5 Community Separation - 2 km from North Lanarkshire Urban Area.

5. On page 33 of the Modified Proposed Plan, the second sentence under the heading ”Assessment Criteria for Utilities Development” should be modified by the addition of the words “specific protection and” after”….in terms of…” In addition, the words “PROT and” should be inserted before “EDQ Policies”. The modified sentence should read:

> “In addition, all Planning Applications will be assessed for their suitability for being located in the Land Use Character Areas in which they are proposed in terms of specific protection and environmental qualities as required by the PROT and EDQ Policies of this Plan.”

6. On Page 84 of the Modified Proposed Plan, an additional bullet point should be added to the end of the criteria listed under EDQ 1 as follows:

> “in addition to the criteria set out here, proposals for renewable energy development must have regard to the considerations set out in Scottish Planning Policy paragraph 169.”

Issue 008	**Natural Environment & Green Network Assets**	
Development plan reference:	Protecting Assets PROT A Policy, Categories and Guidance Pages 37 - 38	**Reporter:** Sue Bell
Body or person(s) submitting a representation raising the issue (including reference number):		
Ogilvie Homes (189) Stewart Milne Homes (216) Upland Developments Limited (226) Woodblane Developments Limited (240) Sir Frank Mears Associates (261) Eman Cheung-Buchanan (268) Scottish Natural Heritage (SNH) (272)		
Provision of the Development Plan to which the issue relates:	PROT A Policy Natural Environment and Green Network Assets North Lanarkshire Council will protect natural and resilient sustainable places by safeguarding natural heritage assets. PROT A Guidance When considering future development affecting the natural environment and the specific Green Network Assets identified in this Policy, the Council will seek guidance where appropriate from Scottish Natural Heritage. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		
Ogilvie Homes (189) and supporting documents RD041-042, objects to terms of Policy PROT A in relation to CfS/MIR Site 0006/02, Kings Drive, Westerwood, Cumbernauld (SM028 and SM029), on the grounds that the site does not function as a valuable landscape buffer and the Council has failed to take into account two recent Planning Appeals in which Reporters found that the site is not a formal landscape buffer, rather it should be described as unallocated land within the settlement boundary. Stewart Milne Homes (216.274) and supporting documents RD114-118, Supports inclusion of Proposed Housing Site 03/08, at Mosside Farm, Airdrie, but objects to the western boundary as shown on Map 8.4, seeking an extension to include the whole pf CfS/MIR Site 0003/08 (SM064) put forward. Upland Developments Limited (226) and supporting documents RD159-160, objects to the non-allocation of CfS/MIR Site 0007/05, Cumbernauld Road/Woodhead Road, Muirhead (SM030), as a Proposed Housing Development Site on grounds that allocating the site would not automatically or inevitably result in coalescence of the neighbouring settlements of Stepps, Muirhead and Crowwood, as there are planning controls and powers which can be applied to prevent this. In addition, there is a need for specialist housing provision of this kind for elderly residents in the Moodiesburn area that has become more apparent since the Local Plan Examination and Adoption. This development could contribute to meeting that demand. Woodblane Developments Limited (240) and supporting document RD201, objects to		

CfS/MIR Site 0019/12, Eastfield Strip, Old Edinburgh Road, Harthill (SM024), being protected under this Policy, on the grounds that there is no obvious up-to-date evidence base to justify this site's designation as a Site of Importance for Nature Conservation.

Sir Frank Mears Associates (261) objects to the omission of land to the East of Biggar Road, Cleland (SM003), which should be identified in the Plan to allow the expansion of the settlement and bring forward green network opportunities.

Eman Cheung-Buchanan (268) objects to the provisions of Policy PROT A in respect of the Urban Green Network on the grounds that the stated wording is not sufficiently strongly worded in order to achieve the Policy's aims.

Scottish Natural Heritage (272) objects to the boundaries of Hassockrigg and North Shotts Mosses and Slamannan Plateau Sites of Special Scientific Interest being shown incorrectly on the Protection Map.

The Map Book format makes it very difficult to find a specific Protect (or Promote) location within the plan area and identify the Protect policies that apply to the site and adjacent areas (particularly where a site is on the edge of a page). This is further exacerbated by the provision of the Map Keys at the beginning of the Map books prior to the numerous individual maps.

Modifications sought by those submitting representations:

Ogilvie Homes (189) seeks the removal of CfS/MIR Site 0006/02 (SM028 and SM029) from forming part of the proposed Green Network and instead include it as "white land".

Stewart Milne Homes (216.274) seeks an extension of the western boundary of Proposed Housing Development Site 03/08 to include the whole of CfS/MIR Site 0003/08, as shown in its attached Location Plan (SM064).

Upland Developments Limited (226) seeks the allocation of CfS/MIR Site 0007/05 as a Proposed Housing Development Site (SM030), specifically for the development of a modern retirement village comprising care home, care village, and retirement housing.

Woodblane Developments Limited (240) seeks the removal of the Site of Importance for Nature Conservation protection from CfS/MIR Site 0019/12, Eastfield Strip, Harthill (SM024), under Policy PROT A and its allocation as a Proposed Business Development Site.

Sir Frank Mears Associates (261) seeks the allocation of this site to allow for the expansion of the Green Network as part of a masterplan for the east of Cleland (SM003).

Eman Cheung-Buchanan (268) seeks the replacement of the first sentence of Policy PROT A Category A4 Guidance "Planning permission will only be granted…in environmental terms" with "more robust protective wording" reflecting the Adopted North Lanarkshire Local Plan, such as "The Council will maintain community wellbeing in residential areas by protecting Urban Green Network."

Scottish Natural Heritage (272) seeks amendment of the boundary of the Hassockrigg and North Shotts Mosses Site of Special Scientific Interest (A2) site to take account of changes made at the western corner in 2013, and identification of the Slammanan

Plateau Site of Special Scientific Interest as a National (A2), as well as a Special Protection Area International A1 site on the Protection Map.

Scottish Natural Heritage (272) seeks the provision of a large single map covering the whole Plan Area, or several maps split by Area Strategies (Local Area Partnership Areas), with both Protect Assets and Promote Locations shown together as well as a key and legend.

Summary of response by planning authority:

Ogilvie Homes (189) - The Council does not use the term “white land”, which implies that a complete lack of policy coverage applies to a site, but recognises that the site forms part of the Land Use Character Area General Urban Area. However, Westerwood is a designed neighbourhood reflecting the original Cumbernauld New Town Plan and as such it is considered to contribute to the landscape character and setting of the settlement providing a transition from rural to urban. The Council disagrees with the removal of this site from the Green Network. It is worth pointing out that both Planning Appeals referred to by the objector were dismissed.

Stewart Milne Homes (216.274) - Matters raised in this objection concerning the partial inclusion of Proposed Housing Site 03/08 and its western boundary are addressed in Issue 04 PROM LOC 3 Housing Development Sites and Issue 17 PP 4 Green Belt. The Council considers that the Green Belt designation is appropriate at this location, given constraints and concerns relating to the integrity of Dunbeth Moss, so disagrees with there being any need to change the site boundary as suggested.

Upland Developments Limited (226) - The Council considers that the matters raised are addressed under Issue 04 PROM LOC 3 Housing Development Sites and Issue 17 PP 4 Green Belt. The Council maintains that sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that these do not represent sustainable locations for any further release.

Woodblane Developments Limited (240) - The Council considers that the Business Development Site matters raised in this are addressed under Issue 03 PROM LOC 2 Business Development Sites. The Local Development Plan does not designate areas of nature conservation, but merely indicates w4here they are and what Policies apply to them. Sites of Importance for Nature Conservation (SINC) are duly designated by a different arm of the Council, NLC Greenspace. SINC 86/66 was designated in 1999 as “scrub including sedge-rich pasture which is good for breeding birds. Species include Song Thrush, Reed Bunting and Northern Marsh Orchid”. A review of Sites of Importance for Nature Conservation is planned.

Sir Frank Mears Associates (261) - The Council considers that the matters raised are addressed within Issue 03 PROM LOC 2 Business Development Sites, Issue 04 PROM LOC 3 Housing Development Sites and Issue 17 PP 4 Green Belt. The Council maintains that sufficient sites have been allocated through the Business & Industrial Land Supply and Effective Housing Land Supply and proposed additions and that this does not represent a sustainable location for any further release. No expansion of Cleland is required at this time. The site is designated as Green Belt and was not identified as a Green Network Strategic Delivery Area in the North Lanarkshire Local Development Plan Modified Proposed Plan Green Network Opportunities Background Report (AD28). Any forthcoming planning application would require to demonstrate that it has regard to the

provision of Green Network opportunities as part of the design process for development from the outset.

Eman Cheung-Buchanan (268) - The specific identification of areas of land to be protected under Policy PROT A Category A4 affords a higher level of protection than the otherwise broadly equivalent blanket Adopted North Lanarkshire Local Plan Policy HCF 1B1. The higher level of protection is explicit in the Guidance wording "…proposals potentially affecting…", rather than restricting the protection to within those "…shown on the proposals map." as stated in Policy HCF 1B in the Adopted North Lanarkshire Local Plan. The Council considers that deleting the first sentence of Policy PROT a Category A4 Guidance could serve to have the opposite effect as that desired by the objector and dilute the level of protection, by removing the consideration of the potential impact that proposals on neighbouring land may have on the identified Urban Green Network. However, the objector's general point in seeking to enhance the Policy Guidance is helpful. Accordingly, should the Reporter find it acceptable, the Council proposes that the objector's suggested sentence "The Council will maintain community wellbeing in residential areas by protecting Urban Green Network" is added at the beginning of Policy PROT A Category A4 Guidance, with no deletion of existing wording.

Scottish Natural Heritage (272) - The Council accepts that this a factual error. The maps will be updated to reflect the correct boundaries of the Hassockrigg and North Shotts Mosses Sites of Special Scientific Interest in the Local Development Plan. Similarly, the boundary of the Slamannan Plateau Site of Special Scientific Interest will be outlined in blue to accord with both of its National designations.

The maps in the hard copy version of the Map Book are schematic and for indicative purposes only. Promote and Protect Maps are intended to be viewed online on the Council LDP webpage and are grouped by Local Area Partnership Areas. The Council does not agree that additional maps are required.

Reporter's conclusions:

King's Drive, Westerwood (SM028 & SM029)

1. Ogilvie Homes (189) have objected to the inclusion within the green network of parcels of land lying to the east of Dullatur Road, Westerwood, Cumbernauld. It has also raised a similar objection to the inclusion of an adjoining plot of land within the green belt, which the council considered under issue 17. The representor seeks the removal of the land from the green network and green belt respectively. It wishes the areas identified as green network to be shown as within the boundary of the general urban area, but makes no request for an alternative allocation of the green belt land. Given the proximity of these plots of land to each other and their joint planning history, my assessment below considers both these aspects.

2. The representation relates to a relatively narrow strip of land lying adjacent to the east side of Dullatur Road. This is sub-divided into three plots by King's Drive to the north and Queens Drive to the south. The representor describes the plot to the north of King's Drive as 'site b', and the two plots lying to the north and south of Queens Drive as 'site a'.

3. 'Site a' is shown as contributing to a green network site on the LDP 'protect' and 'promote' map 4.4. 'Site b' is shown as lying within the green belt boundary marked on the LDP promote map 4.4.

4. During my site inspection I saw that 'site b' is a broadly level area of land, which is defined by King's Drive to the south and an access track to North Muirhead Farm to the north. To the east of 'site b', the houses of King's Drive are visible, albeit partially obscured by trees.

5. Apart from a broad strip adjacent to the road verges, which had been mown at the time of my site inspection, the area appears to receive little management. I saw areas of grassland, tall ruderal species, developing scrub and trees. Close to King's Drive, 'site b' supports a short length of wall and fencing, which together with a similar arrangement on the northern portion of 'site a', provides an entrance 'gateway' to King's Drive.

6. The northern part of 'site a' ('middle' plot) slopes northwards towards King's Drive. It has areas of grassland and tall ruderal vegetation towards the north with trees towards the southern end. The southern part of 'site a', south of Queens Drive has mature mixed woodland. This woodland extends to the roundabout with Eastfield Road and links to the line of semi-continuous tree cover along Eastfield Road. Sections of wall on both plots, adjacent to Queens Drive create an entrance 'gateway' similar to that for King's Drive.

7. Based on my site inspection I saw that there was little to physically distinguish the plots of land. Together, these sites form a semi-continuous strip of undeveloped land which links directly with the open countryside between Westerwood and Dullatur to the north. I observe that 'site a' forms the western arm of a larger, roughly U-shaped area of undeveloped land which extends around the southern, eastern and northern boundaries of the residential development to the east of Dullatur Road.

8. Turning first to 'site b', whilst it is located at the north-western extremity of the settlement, I saw that it is substantially surrounded on three sides by existing development. King's Drive sits to the north-east. Land to the south and south-west has been developed for housing (sites NLCN0457 & NLCN1209 in the proposed plan). This development extends north-westwards to a point beyond the north-westernmost boundary of 'site b'. When approaching from Dullatur to the north-west, these houses, which are elevated above road level, form the visual extent of the settlement boundary on the western side of the road.

9. Notwithstanding my comments above, I saw that the site is contiguous with the wider countryside and green belt that sits to the north and west, which acts to separate Westerwood from Dullatur. The council has referred to its Urban Boundaries Review Background Report (AD27), which was used to identify long-term and robust green belt boundaries. It notes that the green belt boundary is sensitive to the original design principles of Westerwood and the original Cumbernauld New Town plan. In addition, I note that Scottish Planning Policy does not prescribe the scale, size or form of the green belt. At paragraph 51 it notes that the spatial form of the green belt should be appropriate to the location. It may take the shape of a buffer, corridor, strip or wedge. Whilst representing a small, wedge-shaped extension, the area is clearly defined, using robust boundaries. Thus, I conclude that 'site b', does form a logical extension of the green belt.

10. Turning to 'site a', the council considers that this site contributes to the landscape character and setting of the settlement and provides a transition from rural to urban. However, I note that the representor does not consider that the council has provided any evidence of assessment of the land to justify its inclusion within the wider green network.

11. I am aware of the recent planning history of the sites, involving three applications for

housing development, including 'site a' and 'site b'. At the time of writing, two of these applications had been refused on appeal and the third is subject to an ongoing appeal, following the quashing of the previous appeal decision by the Court of Session.

12. Nevertheless, I consider that there is an important distinction to be made between the procedures and processes for consideration of development management proposals and those for adopting a new local development plan.

13. Scotland operates under a 'plan-led' system. As Paragraph 1 of Circular 6/2013 sets out, "Development plans are the basis for planning decision making…". Section 25 of the Town and Country Planning (Scotland) Act 1997 as amended requires decisions in respect of planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise.

14. In other words, the spatial strategy, which sets out acceptable uses of different areas of land, and supporting policies for decision-making are determined and set out within the local development plan. Applications for development must be compared against the spatial strategy and policies within the local development plan, in order to assess their individual acceptability.

15. The appeal decisions referred to above were made within the context of the current adopted local plan. Within that plan, 'site a' is identified as unallocated or 'white' land within the settlement boundary. Such areas do not receive any particular policy protection within the plan, although proposals for such areas are expected to meet certain criteria, which apply to all developments. That is, the principle of development is acceptable in these areas, subject to the proposal meeting the relevant criteria. These other policies include policy DSP 4, which is concerned with quality of development.

16. 'Site b' is identified as a 'community facility' subject to the provisions of policy HCF 1 B1 within the adopted local plan. The policy states that "the council will maintain community well-being in residential areas by protecting those community facilities shown on the proposals map." That is, these sites receive a higher level of policy protection than the unallocated land.

17. The different allocation of the sites within the adopted local plan influences the way in which the policies of the plan are applied. This was set out in the findings of the Court of Session, when it considered a challenge against the third appeal decision for the sites. It concluded that policy DSP4 is concerned with the quality of development and is not about whether or not there should be development at a particular location. That is, it presupposes that the principle of development is acceptable, subject to the individual proposal meeting certain criteria.

18. The Court of Session ruling also confirmed the role of the local development plan in defining those areas where development would be acceptable: "The LDP proposals map sets out which areas are considered to be community facilities requiring protection. These will have been considered at the stage of the examination of the LDP and any objections could have been subjected to appropriate scrutiny."

19. It therefore follows, that if the council wishes to change the allocation or policy status of an area of land, the time to do this is when preparing a local development plan. Paragraph 7 of Circular 6/2013 notes that development plans should be kept up-to-date. Thus, this suggests that the allocation or proposed use of an area of land may change

between the different iterations of a local development plan. Indeed, if land were required to be allocated for a single purpose in perpetuity, there would be little need to update the plan.

20. The Court of Session ruling has stressed the importance of consistency in decision-making. However, those comments were made in relation to how the policies of the adopted local plan had been applied to similar development proposals for the same site. That is a different scenario to that which is before me.

21. Given that the formulation of a new local development plan provides the opportunity for a refresh and review of site allocations and policies, I do not consider that the previous appeal decisions, which were made in a different planning context, should have any particular weight or influence in this examination.

22. I am not considering an application for housing. Indeed, the representation does not seek the allocation of either site for housing. As noted above, the representation seeks the removal of 'site b' from the green belt and 'site a' from the green network. Thus, I am required to consider whether or not the sites meet the relevant criteria for inclusion within the green belt and green network respectively.

23. 'Site a' remains an area of undeveloped, green land, which provides a semi-continuous link with the open countryside to the north west and links with other green areas to the south and east. That is, I find that it provides a green corridor into the settlement. Whilst I accept that general ecological considerations were not identified as a reason for refusal of the previous applications (although the need to protect a potential bat roost was identified), I have been presented with no evidence that ecological value is a prerequisite for identifying sites that form part of the green network.

24. Scottish Planning Policy provides support for green infrastructure and green networks. The definition of green network sites within the modified proposed plan includes for open space amenity areas and other green assets. During my site inspection I saw evidence of informal recreational use, particularly of the woodland areas. Whilst the land did not appear to benefit from intensive management, I saw no obvious signs of anti-social use or fly-tipping. As such, I find that 'site a', especially when considered in relation to 'site b' meets that definition of a green network site and contributes to wider green infrastructure.

25. Whilst the representor has not requested the re-allocation of either plot of land for housing, I note that the land was put forward as a possible housing site at the Call for Sites/Main Issues Report stage (site reference 0006/02), but was not subsequently included within the modified proposed plan. In any case, the assessment of the housing land supply considered as part of issue 4 has concluded that there the plan identifies sufficient housing land within North Lanarkshire as a whole and within the Cumbernauld housing sub-market area.

26. I am content that 'site b' meets the criteria for inclusion within the green belt and that 'site a' contributes to the green network. On this basis I find the designations which apply to these sites to be appropriate, and no modification is required.

<u>Mosside Farm, Airdrie</u>

27. Representations in respect of this site are considered as part of issue 4.

CfS/MIR Site 007/05 Cumbernauld Road/Woodhead Road, Muirhead (SM030)

28. The council has considered the representation about this site as part of issue 8. Whilst the site is marked as green belt on the protect map 7.2, it does not appear to be identified as a green network site. Consequently, all representations in respect of this site are addressed under issue 17 Green Belt – Purpose of Place.

CfS/MIR Site 0019/12 Eastfield Strip, Old Edinburgh Road, Harthill (SM024)

29. Representations in respect of this site are considered as part of issue 3.

Land to the East of Biggar Road, Cleland (SM003)

30. The representation in relation to this site is principally addressed within issue 16.

Level of protection afforded by policy

31. The representation does not seek to change the purpose and function of the policy, but is concerned that the proposed wording is not strong enough to safeguard sites contributing to the green network, which may be valued by local residents. It considers that using wording more in line with that used in policy HCF1 part B 'Protecting Residential Amenity and Community Facilities' of the current local plan would be more effective.

32. Scottish Planning Policy (paragraph 219) recognises that green infrastructure and open spaces can build stronger, healthier communities. Paragraph 220 requires planning to "protect, enhance and promote green infrastructure" as an integral component of successful placemaking. Paragraph 224 expects local development plans to identify and protect open space identified as valued or functional or capable of being brought into use to meet local needs.

33. The wording within the adopted local plan in policy HCF 1B1, relates to community facilities and refers to specific sites, which are identified on proposals maps. By contrast, the proposed policy wording relates to potential effects on the urban green network. I accept that this provides a broader scope to consider the effects on the network as a whole as well as protection of individual sites. It would also allow a consideration of potential effects on a site or the network arising from development on neighbouring land.

34. I note that the council is supportive of an enhancement to the policy wording. I find that its proposed text would emphasise the link between community wellbeing and the urban green network, in line with the approach set out in Scottish Planning Policy. As such, I find that it would strengthen the wording of the policy. I have therefore proposed to modify the plan, in line with the council's proposed wording, set out below.

Mapping

35. I note that the council accepts the factual errors in mapping the boundaries of the Hassockrigg and North Shotts Mosses Sites of Special Scientific Interest and that Slamannan Plateau Site of Special Scientific Interest should also be shown as a National (A2) site on the 'protect' map. As these corrections are purely related to factual matters, I see no reason not to accept the proposed modifications.

36. Circular 6/2013 Development Planning sets out the required form and content of proposed plans. Paragraph 79 states that "Scottish Ministers expect LDPs to be concise, map-based documents, making use of plain language and individual policies and proposals in an accessible way." It does not, however, specify how that mapped information should be presented.

37. Whilst I accept that the current paper map book is a little unwieldly, it does set out the location of areas subject to different policies. I also note that the maps are designed to be viewed online, which allows the viewer to customise the area that they view. Given that the information required is supplied in mapped form, I see no reason for requiring the production of a single paper map and hence no modification is required.

Reporter's recommendations:

1. The following text should be added at the beginning of Policy PROT A Category A4 Guidance: "The council will maintain community wellbeing in residential areas by protecting the Urban Green Network."

2. On the Protect Map, the boundary of the Hassockrigg and North Shotts Mosses SSSI site should be redrawn to represent the current boundaries of the designation.

3. The boundary of the Slammanan Plateau SSSI should also be shown as a National (A2) site on the Protection Map, in addition to the International (A1 Natura Site) boundary.

Issue 009	**Mineral Resources**	
Development plan reference:	Protecting Assets PROT C Policy, Categories and Guidance Pages 42 - 43	**Reporter:** Sue Bell
Body or person(s) submitting a representation raising the issue (including reference number):		
Sir Frank Mears Associates (261)		
Provision of the Development Plan to which the issue relates:	PROT C POLICY Mineral Resources North Lanarkshire Council will operate a presumption against proposals for development that would potentially sterilise valuable mineral resources. PROT C Guidance In line with National Policy the Council will safeguard the categories of mineral supplies specified. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		
Sir Frank Mears Associates (261) states that there are considerable mineral resources existing under the land to the east of Biggar Road (SM003) and that their winning should be included in any masterplan for the area.		
Modifications sought by those submitting representations:		
Sir Frank Mears Associates (261) seeks that scope be built into the Plan to actively seek the winning and working of the resources that exist in the land to the east of Biggar Road (SM003) prior to any future expansion of the town in that direction.		
Summary of response by planning authority:		
Sir Frank Mears Associates (261) - The Council does not agree that the Plan should identify the location of mineral resources at this location. Matters regarding mineral extractions are considered at a city region level within the remit of the Approved Clydeplan Strategic Development Plan (AD59). The working of any resources at this location would be addressed through the determination of any forthcoming planning application and would be assessed for the impact of development on the strategic supply as defined in the Strategic Development Plan (AD59).		
Reporter's conclusions:		
1. Scottish Planning Policy requires local development plans to safeguard all workable mineral resources that are of economic or conservation value and ensure that these are not sterilised by other development. It is not prescriptive as to how this should be achieved, nor does it specify that all potential mineral resources should be identified within local development plans. 2. I find that Policy PROT C of the modified proposed plan meets the requirement		

established by Scottish Planning Policy, by setting a clear presumption against proposals for development that would potentially sterilise valuable mineral resources.

3. The policy does not identify the specific location of each and every mineral resource that should be safeguarded; but it is clearly a matter that will be taken into consideration when determining an application for development.

4. The representor has proposed that a masterplan should be prepared to cover various developments related to transport and an extension of Cleland. These proposals are considered as part of Issue 16. Notwithstanding the findings under that issue, the land referenced in the representation is not allocated for development within the local development plan. Therefore, I see no imperative to identify the presence of any mineral resources that may require extraction before it is developed. Should proposals for the land come forward in the future, these would be assessed against the policies within the plan, including Policy PROT C, in terms of the need to avoid sterilisation of any mineral resources that are present.

5. Whilst the representation promotes proactive working of the mineral resources on the land, as noted above this seems to be on the basis of enabling future development without sterilising resources rather than to be driven by an identified shortfall in supply.

6. Given that the purpose of Policy PROT C is to prevent sterilisation of mineral resources, I see no need or justification for modifying the policy to include a reference to a single site that is not specifically allocated for development within the modified proposed plan.

Reporter's recommendations:

No modification required.

Issue 010	**Strategic Town Centres - Purpose of Place**	
Development plan reference:	PP 1A Purpose of Place Policy and Guidance Page 46-49	**Reporter:** Robert Maslin
Body or person(s) submitting a representation raising the issue (including reference number):		
Northern Corridor Community Volunteers (185) Scottish Government (255) Scottish Natural Heritage (SNH) (272) Scoop Asset Management (290)		
Provision of the Development Plan to which the issue relates:	Strategic Town Centres PP 1A Purpose of Place Policy North Lanarkshire Council will support and encourage the provision of a range of appropriate uses and improvements to the physical environment to help maintain the role and function of the Strategic Town Centres and delivery of the Ravenscraig Masterplan and Town Centre Action Plans. PP 1A Guidance All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		

Northern Corridor Community Volunteers (185) objects to Policy PP 1A on the grounds that the town centre focus of planning in North Lanarkshire has led to the neglect of large communities which now have no defined town centre.

Scottish Government (255) objects to Policy PP 1A on the grounds that the policies set out a sequential approach that differs significantly from that required by paragraph 68 of Scottish Planning Policy (AD60). The plan places "local centres" third in the sequential order, after edge of centres (which includes edge of "large centres"), whereas in Scottish Planning Policy they are in the first tier. The introduction of a classification of "Large Centres" and "Business Centres", a term which is neither in, nor complies with Scottish Planning Policy (AD60).

SNH (272) objects to Policy PP 1A on the grounds that the use of the term "Land Use Character Areas" is confusing. In addition, the Council is requested to look at its comments/objections in relation to Policies ID 2, EDQ 1 and EDQ 3 as submitted separately.

Scoop Asset Management (290) objects to this Policy on the grounds that the plan has introduced the term "Business Centres", which is not used in the Scottish Planning Policy (AD60) and that the proposed sequential approach does not accord with Scottish Planning Policy (AD60). As a result, the Westway Park development is elevated to the same sequential status as Cumbernauld Town Centre, which is not in accordance with Scottish Planning Policy. Westway Park should be a "Commercial Centre", not a "Town Centre".

Modifications sought by those submitting representations:

Northern Corridor Community Volunteers (185) suggests that the strategic development policies assigned to town centres be extended to conglomerated urban areas with populations of over 7,000.

Scottish Government (255) seeks that Policies PP 1A and PP 1B should be updated to more closely align with the sequential approach required by Scottish Planning Policy (AD60). Specifically, the policies should be updated to:

- remove the ”large centres” from the first tier of the sequential approach;
- amend both ”large centres” and “business centres” to “other commercial centres” and place them into the third tier in the sequential approach;
- add “local centres” into the first tier in the sequential approach;
- amend the “edge of centre” to follow the wording in Scottish Planning Policy (“edge of town centre”)

SNH (272) seeks that the term “Land Use Character Area” is replaced by the suggested alternative: “Land Use Zone”, to ensure a clearer distinction between these and “Landscape Character Areas”.

Scoop Asset Management (290) seeks the removal of Westway Park from the list of Town and Large Centres in Policy 1B, or, alternatively, if the retail park is to continue to be designated as a “Large Centre”, on an equal footing with Town Centres, then the sequential approach in Policy 1A and 1B should be rewritten as such:

1st Strategic Town Centre
2nd Edge of Strategic Town Centre
3rd Town and Large Centre
4th Edge of Town and Large Centre
5th Local Centre
6th Business Centre (Use Dependent)
7th Out-of-centre,

or, alternatively, in order to comply fully with the Scottish Planning Policy (AD60), Westway Retail Park should be separately identified as a “Commercial Centre” and an appropriate place found in the retail hierarchy for it, below both Strategic Town Centres and Town Centres and their edges, as such.

1st Strategic Town, Town and Large Centres
2nd Edge of Strategic Town, or Town & Large Centre
3rd Local Centre
4th Commercial Centre
5th Business Centre (Use Dependent)
6th Out-of-centre

Summary of response by planning authority:

Northern Corridor Community Volunteers (185) - The Council disagrees with the comment that the town centre focus in North Lanarkshire has led to the systemic neglect of those large communities in North Lanarkshire that have no defined town centre and

that there is no need to widen the categorisation of town centres within the network to include urban areas with populations of over what seems an arbitrary 7,000. The Council considers that each town provides for its surrounding residents, dependent upon catchment, access and range. The Town Centre Action Plans cover a broader spectrum of actions beyond physical improvements. As well as the North Lanarkshire Strategic Town Centres listed in Clydeplan Strategic Development Plan (AD59) Schedule 2 pages 31-36, the Modified Proposed Plan also identifies Town & Large Centres and Local Centres based on floorspace and provision mix. The Council does not agree that further changes are needed in respect of this policy.

Scottish Government (255) and Scoop Asset Management (290) The wording for the sequential approach reflects Clydeplan Strategic Development Plan (AD59), Approved by Scottish Ministers in July 2017. Clydeplan Strategic Development Plan (AD59) does not include commercial centres as a separate category within the network of centres. North Lanarkshire Local Development Plan Modified Proposed Plan is required to reflect the Clydeplan Strategic Development Plan. Accordingly, the Modified Proposed Plan identifies a network of Mixed-Use Centres, categorised by the roles/function/scale of the services they offer and provide. The purpose of the Modified Proposed Plan is to provide a strategic policy framework as part of its placemaking policies to support and guide new development towards the network of mixed use centres.

SNH (272) - Comments/objections relating to Polices ID 2, EDQ 1 and EDQ 3 are dealt with separately. The Council disagrees with the comments that “Land Use Character Areas” are likely to be confusing and does not feel it appropriate to give some form of special protection to the term “Character Areas”. It is the character areas that are the essence and concept of the Plan’s place making focus, not the individual designations, or the more commonly associated with North American planning term zoning *per se*.

Reporter’s conclusions:

Neglect of large communities that have no defined town centre

1. I note that policies PP 1A and PP 1BB seek to encourage provision of a range of appropriate uses in and improvements to town centres. With the exception of Ravenscraig, which is clearly a special case, the policies are concerned with existing town centres. The policies are not seeking to establish new town centres. In view of this, I find that it would not be appropriate to modify the policy in accordance with representation 185.

2. I am not aware of evidence that demonstrates a need for any new town centre in addition to the new centre at Ravenscraig. Without evidence to show need and to show that land and necessary financial resources are available, I am unable to consider recommending that the proposed plan include provision for any additional new town centre.

3. My conclusion is that the proposed plan should not be altered in response to representation 185.

Conformity with Scottish Planning Policy

4. This section addresses representations 255 and 290.

5. Paragraph 62 of Scottish Planning Policy says:

"Plans should identify as town centres those centres which display:

- a diverse mix of uses, including shopping;
- a high level of accessibility;
- qualities of character and identity which create a sense of place and further the well-being of communities;
- wider economic and social activity during the day and in the evening; and
- integration with residential areas."

6. Paragraph 68 of Scottish Planning Policy says:

"Development plans should adopt a sequential town centre first approach when planning for uses which generate significant footfall, including retail and commercial leisure uses, offices, community and cultural facilities and, where appropriate, other public buildings such as libraries, and education and healthcare facilities. This requires that locations are considered in the following order of preference:

- town centres (including city centres and local centres);
- edge of town centre;
- other commercial centres identified in the development plan; and
- out-of-centre locations that are, or can be, made easily accessible by a choice of transport modes."

7. In the proposed plan, the PP 1A Purpose of Place Policy Guidance includes the following:

1st Strategic Town, Town & Large Centre
2nd Edge of Strategic Town, or Town & Large Centre
3rd Local Centre
4th Business Centre (use dependent)
5th Out-of-Centre

The accompanying text refers to the sequential approach contained in Scottish Planning Policy. From this, I take it that the above list represents the sequential approach of the proposed plan.

8. The proposed plan's first preference includes town and large centres. Page 51 of the plan includes three centres - Birkenshaw Trading Estate, Caledonian Park and Westway Park - that are said to be characterised by large retail sheds selling bulky goods, electrical and white goods, DIY goods and car equipment. The council does not dispute this description. Site inspections confirm that the description is correct. I find that these three centres do not display the characteristics listed in paragraph 62 of Scottish Planning Policy. This means that they are not town centres.

9. I find that Birkenshaw Trading Estate, Caledonian Park and Westway Park are locations that should be identified as commercial centres in accordance with paragraph 63 of Scottish Planning Policy.

10. The sequential approach in paragraph 68 of Scottish Planning Policy shows town centres as first preference. Commercial centres are third preference.

11. The findings in the preceding three paragraphs lead me to conclude that inclusion of Birkenshaw Trading Estate, Caledonian Park and Westway Park within the first preference of the proposed plan's sequential approach is contrary to Scottish Planning Policy.

12. The council says that the proposed sequential approach reflects Clydeplan.

13. I note that Clydeplan, in paragraph 63 and in policy 4, acknowledges the town centre first principle contained in Scottish Planning Policy.

14. I find that Clydeplan's lack of reference to commercial centres as a separate category within the network of centres is a reflection of the strategic scale of Clydeplan. I find nothing to suggest that this lack of reference is intended to permit local development plans to rewrite the order of preference in paragraph 68 of Scottish Planning Policy. Rather, I find that paragraph 63 and policy 4 of Clydeplan indicate that due attention must be paid to Scottish Planning Policy.

15. The council says that the purpose of the proposed plan is to provide a strategic policy framework as part of its placemaking policies to support and guide new development towards the network of mixed-use centres.

16. I find that Scottish Planning Policy's sequential approach seeks to direct appropriate development, in the first instance, to town and local centres. The council's purpose conflicts with this. I find that Scottish Planning Policy does not prevent new development of an appropriate kind in centres that are not town centres.

17. Representation 255 says that, in Scottish Planning Policy, local centres are included in the first preference. In the proposed plan, local centres are third preference. The council makes no response to this point.

18. I find that local centres have an important role. Among other things, they may provide for daily needs near to where people live. Scottish Planning Policy makes it clear that they should be included in the first preference. My conclusion is that the proposed plan should be altered so that local centres are included in the first preference of the sequential approach.

19. In the proposed plan, the fourth preference in the sequential approach is "business centre". Policies PP 1B and PP 1C say that business centres appear in the sequential approach because they may have the infrastructure capacity to cope with higher volumes of people and traffic and are preferable to sporadic, isolated out-of-centre development. The council's response to representation 255 provides no additional justification.

20. I note that the proposed plan identifies five strategic business centres and 13 local business centres. Policies PP 2A and PP 2B say that the strategic business centres and the local business centres can accommodate a full range of Class 4 Business, Class 5 Industrial and Class 6 Storage or Distribution uses. Ancillary development, including retail, can be appropriate.

21. I find that the business centres are characterised by industrial and commercial uses. They are clearly distinct from commercial centres as described in paragraph 63 of Scottish Planning Policy. They do not have, and, in the proposed plan, are not intended to have the emphasis on retailing, leisure and other services which is apparent in paragraphs 61 to 69 in Scottish Planning Policy.

22. In paragraph 68 of Scottish Planning Policy, out-of-centre locations are qualified by reference to them being locations that are, or can be, made accessible by a choice of transport modes. Inclusion of a similar qualification in the proposed plan would go some way to meeting the council's concern about sporadic and isolated out-of-centre development.

23. My conclusions are that business centres should not be included in the sequential approach contained in the proposed plan and the out-of-centre category should be qualified in accordance with Scottish Planning Policy.

24. I note that representation 255 says that, if the council wishes "business centres" to be treated sequentially, preferable to out-of-centre locations, they should be identified as part of a commercial centres category. The council has not responded to this suggestion. In the circumstances, I conclude that business centres should not be included in this part of the proposed plan.

25. In summary, the council's response to the representations does not justify a sequential approach that is contrary to Scottish Planning Policy. The proposed plan should be altered so that:

- the first preference in the sequential approach does not include the three "large centres", namely Birkenshaw Trading Estate, Caledonian Park and Westway Park;
- the three "large centres" should be described as "commercial centres";
- local centres should be included in the first preference of the sequential approach;
- commercial centres should be shown as third preference in the sequential approach;
- the sequential approach in the town and local centres part of the proposed plan (pages 47 to 55) should not include business centres; and
- out-of-centre locations should be qualified, as in Scottish Planning Policy.

<u>Land use character areas</u>

26. The representation relating to land use character areas is addressed in issue 022.

Reporter's recommendations:

1. On page 44 of the proposed plan, delete "1B Town & Large Centres" and instead put "1B Other Town Centres".

2. On page 46 of the proposed plan, delete the section headed "Town & Large Centres" and in its place put:

Other Town Centres

Three other town centres.

3. On page 46 of the proposed plan, after the section headed “Local Centres”, insert the following new section:

Commercial Centres

Three large urban centres with floorspace over 20,000 square metres.

4. On page 48, under the heading “PP 1A Purpose of Place Policy Guidance”, in the first paragraph delete all the text that begins “Business Centres appear” and ends “Policies PP 2A and PP 2B”.

5. On pages 48, 51 and 54 of the proposed plan, delete the following:

1st Strategic Town, Town & Large Centre
2nd Edge of Strategic Town, or Town & Large Centre
3rd Local Centre
4th Business Centre (use dependent)
5th Out-of-Centre

and replace it with:

1st Strategic town centres, other town centres and local centres
2nd Edge of town centre
3rd Commercial centres
4th Out-of-centre locations that are, or can be, made easily accessible by a choice of transport modes.

6. On pages 51 and 52 of the proposed plan, delete the heading “1B Town & Large Centres” and put instead “1B Other Town Centres”.

7. On page 51, in the text under the heading “PP 1B Purpose of Place Policy” delete “Town and Large Centres” and instead put “Other Town Centres”.

8. On page 51, under “PP 1B Purpose of Place Policy Guidance” in the left-hand column:

delete “Town & Large Centres” and put “Other Town Centres”; and

delete “Birkenshaw”, “Caledonian Park” and “Westway Park, Cumbernauld”.

9. On page 51, in policy PP 1B of the proposed plan, in the right-hand column, “Town and Large Centres” appears twice. Delete both and replace with “Other Town Centres”.

10. On page 52, in the text under the heading “AD 1B Amount of Development Policy Guidance”, delete “Town & Large Centres” and put “Other Town Centres”.

11. On page 54, delete the paragraph that begins “Business Centres appear in”.

12. On page 55, under the heading “AD 1C Amount of Development Policy Guidance”, delete “Strategic Town and Town & Large Centres” and put instead “Strategic Town Centres and Other Town Centres”.

Issue 011	**Strategic Town Centres - Amount of Development**	
Development plan reference:	AD 1A Strategic Town Centres Policy and Guidance Page 49	**Reporter:** Robert Maslin

Body or person(s) submitting a representation raising the issue (including reference number):

Scottish Government (255)
Scoop Asset Management (290)

Provision of the Development Plan to which the issue relates:	1A - Strategic Town Centres AD 1A Amount of Development Policy Applications for planning permission for new development will be assessed for their implications related to the amount of development proposed. AD 1A Guidance All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

Planning authority's summary of the representation(s):

Scottish Government (255) objects to Policy AD 1A requiring an assessment of impact of proposals for shops (over 5,000 m^2) within a Strategic Centre as this is not consistent with Scottish Planning Policy (SPP).

Scoop Asset Management (290) objects to Policy AD 1A, as it is not considered that 5,000 m^2 is the appropriate level of retail development above which the sequential approach should apply as there is no justification for this amount and it should be changed to 1,000 m^2.

Modifications sought by those submitting representations:

Scottish Government (255) suggests that Policy AD 1A Amount of Development should be updated to remove requirements for impact assessments for sites within town centres.

Scoop Asset Management (290) suggests that Policy 1A Amount of Development should be amended to read: Box 1 "Shops" should state "over 1,000 m^2…" rather than "5,000 m^2…". The box should also be amended with "1,000 m^2" replacing "5,000 m^2".

Summary of response by planning authority:

Scottish Government (255) - The wording of AD 1A Guidance reflects the Approved Clydeplan Strategic Development Plan (AD59) as required by Scottish Planning Policy. The Council does not agree that further changes are needed in respect of this Policy.

Scoop Asset Management (290) - The wording of AD 1A Guidance reflects the Approved Clydeplan Strategic Development Plan (AD59) as required by Scottish Planning Policy (AD60). The Council does not agree that further changes are needed in respect of this Policy.

Reporter's conclusions:

Requirement for impact assessments

1. Clydeplan identifies six strategic centres in North Lanarkshire. These are the centres listed in PP 1A of the proposed local development plan. Clydeplan's policy 4: Network of Strategic Centres includes the following.

"….. all strategic development proposals should …..

> • protect and enhance the long term health of Glasgow City Centre to ensure there is no detrimental impact on its role and function, as set out in Schedule 2 and in support of Joint Strategic Commitment – Glasgow City Centre; and
>
> • recognise that whilst the Network of Strategic Centres is the preferred location for strategic scale development, such proposals are subject to the sequential approach set out in Scottish Planning Policy and the assessment of impact on the other Strategic Centres in the network and town centres to ensure that there is no detrimental impact on their role and function."

2. I find that policy 4 does not encourage an unlimited scale of development in the strategic centres. Rather, it recognises that development in one centre might have an impact on other centres. For this reason, I find that it is appropriate that policy AD 1A in the proposed plan requires an assessment of impact on other centres.

3. I agree that Scottish Planning Policy refers to impact assessment only in relation to development that is outwith a centre and contrary to the development plan, but I am not aware of any provision in Scottish Planning Policy that advises against impact assessment in other circumstances. Paragraph 70 of Scottish Planning Policy includes the following:

> "New development in a town centre should contribute to providing a range of uses and should be of a scale which is appropriate to that centre. The impact of new development on the character and amenity of town centres, local centres and high streets will be a material consideration in decision-making."

I find that this indicates that impact assessment in other circumstance may be appropriate.

4. My conclusion is that there is no need to remove from policy AD 1A a requirement for impact assessments.

The 5,000 square metres criterion

5. Representation 290 says that there is no justification for 5,000 square metres being the amount of retail development above which assessment of impact is required. "If arbitrary figures are to be used then it is suggested that over 1,000 sqm would be more appropriate."

6. I note that Clydeplan (page 94, schedule 14) contains the 5,000 square metres threshold. For this reason my conclusion is that, in policy AD 1A, the size of development should remain as 5,000 square metres.
Reporter's recommendations:
No modifications required.

Issue 012	**Town & Large Centres - Purpose of Place**	
Development plan reference:	PP1B Purpose of Place Policy and Guidance Page 51	**Reporter:** Robert Maslin
Body or person(s) submitting a representation raising the issue (including reference number):		
Equorium Property Company Limited (217) Ediston Properties Ltd (248) Scottish Government (255) Scoop Asset Management (290) William Grant & Sons (291)		
Provision of the Development Plan to which the issue relates:	Town & Large Centres PP 1B Purpose of Place Policy North Lanarkshire Council will support and encourage the provision of a range of appropriate uses and improvements to the physical environment to help maintain the role and function of the Town and Large Centres within the Network of Centres and support delivery of Town Centre Action Plans. PP 1B Guidance In the Town and Large Centres, high footfall generating uses are appropriate, where the infrastructure exists to support them and facilitate the transport of large numbers of people and neighbouring uses are assessed as being compatible. This accords with the sequential approach as defined in Scottish Planning Policy in support of the Town Centre First Principle. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		
Equorium Property Company Limited (217) and supporting documents RD124-126, objects to Policy PP 1B as in the Modified Proposed Plan the site would be designated as "General Urban Area" and not as a "Commercial Centre". Requests that the site be identified as either a "Mixed-use Centre" with scope for Class 1, or within a new definition of "Commercial Centres". Ediston Properties Ltd (248) and supporting document RD212, objects to the non-inclusion of B&Q, Caldeen Road, Coatbridge, under Policy PP1B, on the grounds that it is the only commercial centre that has not been designated as a Town and Local Centre in the Modified Proposed Local Development Plan, with no reason for this given. Scottish Government (255) and Scoop Asset Management (290) object to Policy PP 1B on the grounds that the Modified Proposed Plan does not categorise any of its Centres as "Commercial Centres", but identifies the retail parks of Birkenshaw, Caledonian and Westway as "Large Centres". Identifying these centres as "Large Centres" and not "Commercial Centres" elevating them to the first tier of the Plan's sequential approach, equivalent to Cumbernauld Town Centre, and does not accord with national policy on town centres. These sites contain the configuration that is associated with a commercial centre and do not include the wider range of town uses/characteristics as listed in		

Scottish Planning Policy (AD60) paragraph 62. Westway Park fulfils the role of a "Commercial Centre", not a town centre, which the existing Local Plan recognised and the emerging Local Development Plan should do so too.

William Grant & Sons (291.398) and supporting documents RD249-250, objects to the land directly adjacent to its site at Wardpark North, Cumbernauld, being designated under Policy PP1B for mixed use-development as part of the Westway Retail Park expansion. Due to the nature of the business, the company's site has a major hazard consultation zone around it, which covers part of the allocated Westway Town & Large Centre Site. Any development within and near to this consultation area has the potential to severely limit the ongoing and future operation of the site.

Modifications sought by those submitting representations:

Equorium Property Company Ltd (217) seeks that Mackinnon Mills, Coatbridge, should be identified as a either a "Mixed-use Centre", with scope for Class 1 retail use, or that a new definition of "Commercial Centres" should be added to the definitions of Centres under the Placemaking Policies on page 46 of the Modified Proposed Plan, with Mackinnon Mills included specifically. In addition, the site should be removed from the General Urban Area on Map Book Promote page 9.4 and replaced with a "Mixed-use Centre" or "Commercial Centre" designation.

Ediston Properties Ltd (248) seeks the allocation of B&Q, Caldeen Road, Coatbridge as Town and Large Centre under Policy PP 1B and the Proposals Maps page 9.4 changed accordingly.

Scottish Government (255) and Scoop Asset Management (290) seek that Policy PP 1B be amended so that "Large Centres" Retail Parks - Birkenshaw, Caledonian Park and Westway Park are designated as "Commercial Centres". Scoop Asset Management (282) make an alternative additional suggestion that Strategic Town Centres are placed on their own at the top of the retail hierarchy.

William Grant & Sons (291.398) seeks the modification of the boundary of the proposed "Town & Large Centre" at Westway, Cumbernauld, to include an appropriate buffer zone around the William Grant & Sons facility at Wardpark, Cumbernauld.

Summary of response by planning authority:

Equorium Property Company Ltd (217) - The Sequential Approach set out in the Modified Proposed Plan reflects the Approved Clydeplan Strategic Development Plan, under which context none of North Lanarkshire centres can be described as a "commercial centre". The Town and Large Centres are not just retail parks, they incorporate other uses, have more parking, open space, community uses, etc., and are not just selling "bulky goods". The Council's Sequential Approach acknowledges the changing nature and function of retail parks.

The Modified Proposed Plan identifies a network of Mixed-Use Centres, categorised by their different roles and functions. Whilst the site does offer retail, the Council does not consider it fits any of the categories identified within the Mixed-Use Centres network. The Council stresses that this does not present an impediment to future development of the site.

Ediston Properties Ltd (248) - The Council no longer recognises isolated, large, single-user retail stores as constituting any form of commercial centre. This is not an impediment to continued retail use at these locations. Whilst the site does offer retail, the Council does not consider that it fits any of the categories identified within the Mixed-Use Centres network. The Council does not accept that further changes are needed in respect of this policy.

Scottish Government (255) and Scoop Asset Management (290) - The Sequential Approach set out in the Modified Proposed Plan reflects the Approved Clydeplan Strategic Development Plan (AD59), under which context none of North Lanarkshire centres can be described as a "commercial centre". The Town and Large Centres are not just retail parks, they incorporate other uses, have more parking, open space, community uses, etc., and are not just selling 'bulky goods'. The Council's Sequential Approach acknowledges the changing nature and function of retail parks The Modified Proposed Plan identifies a network of Mixed-Use Centres, categorised by their different roles and functions.

William Grant & Sons (291.398) - Planning Permission in Principal was granted for a mixed-use leisure, retail and business development adjacent to Williams Grant & Sons site in Cumbernauld. As a result of comments from the Health and Safety Executive a condition was attached, restricting the type of uses by location within the HSE Consultation Zone around William Grant and Sons site. HSE would be consulted specifically on any planning applications that potentially affect the hazard consultation zone. The effectiveness of this process means that the Council does not agree that further changes are needed in respect of this Policy.

Reporter's conclusions:

Mackinnon Mills

1. With regard to the representation and the council's response, I am not aware of anything in Clydeplan that says none of North Lanarkshire's centres can be described as a "commercial centre". Schedule 2 of Clydeplan identifies one commercial centre as having strategic significance. This does not preclude the possibility that there are other commercial centres that do not have strategic significance.

2. Paragraph 63 of Scottish Planning Policy says:

> "Plans should identify as commercial centres those centres which have a more specific focus on retailing and/or leisure uses, such as shopping centres, commercial leisure developments, mixed retail and leisure developments, retail parks and factory outlet centres….."

The representation contains a description of Mackinnon Mills. The council does not dispute the description. From the description and a site inspection, I find that Mackinnon Mills is a commercial centre in terms of paragraph 63 of Scottish Planning Policy.

3. The representor wishes to redevelop the site to improve the retail and tourism facilities. The council makes no objection to continued use of the site for its present purposes.

4. I note that the current adopted local plan designates the site as a commercial centre.

My attention has not been drawn to any change in circumstances that points to a need to alter this designation.

5. My conclusion is that the proposed plan should show Mackinnon Mills as a commercial centre.

B&Q, Caldeen Road, Coatbridge

6. In its response to the representation, the council gives no reason why it no longer recognises isolated, large, single-user retail stores as constituting any form of commercial centre. As already noted, paragraph 63 of Scottish Planning Policy says that plans should identify as commercial centres those centres that have, among other things, a more specific focus on retailing. From submissions and a site inspection, I find that the B&Q site at Caldeen Road has a very specific focus on retailing.

7. The proposed plan shows the B&Q site as part of a larger area that is designated as a "business centre". Apart from B&Q, the business centre contains a considerable amount of industrial and commercial development. I find that the retail character of the B&Q site is distinct from the character of the rest of the business centre.

8. The council's response to the representation indicates that there is no intention to seek any change in the use of the B&Q site.

9. In the current, adopted local plan the B&Q site is designated as a commercial centre. My attention has not been drawn to any change in circumstances that points to a need to alter this designation.

10. The representor requests that the B&Q site be allocated as a Town and Large Centre. I find that this would not be appropriate in view of changes that are recommended in issue 10.

11. My conclusion is that the proposed plan should show the B&Q site as a commercial centre.

Representations considered elsewhere

12. Points put forward in representations 255 and 290 and the council response are considered in issue 10.

Westway Retail Park Expansion

13. I note that planning permission in principle has been granted for development on the land adjacent to the representors' site, that development is restricted and that there will be further consultation with the Health and Safety Executive when development details are submitted.

14. I also note that the current, adopted local plan shows the land in question designated as part of a commercial centre.

15. Bearing in mind the commitment to development on the adjacent site and the intention to carry out further consultation with the Health and Safety Executive, I find that there is no need for a buffer zone around the representors' site.

Reporter's recommendations:
1. The site of Mackinnon Mills at Kirkshaws Road, Coatbridge, the boundary of which is shown on document RD125, should be designated as a commercial centre. 2. The site of B&Q at Caldeen Road, Coatbridge, the boundary of which is shown on document RD212, should be designated as a commercial centre.

Issue 013	**Town & Large Centres - Amount of Development**	
Development plan reference:	AD1B Town & Large Centres Policy and Guidance Page 52	**Reporter:** Robert Maslin

Body or person(s) submitting a representation raising the issue (including reference number):

Equorium Property Company Ltd (217)
Scottish Government (255)
Scoop Asset Management (290)

Provision of the Development Plan to which the issue relates:	Town and Large Centres Policy AD1B Amount of Development Applications for planning permission for new development will be assessed for their implications related to the amount of development proposed. Policy AD 1B Guidance Where specified by this Policy or Guidance, applicants will be expected to provide the identified appraisals or assessments. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

Planning authority's summary of the representation(s):

Equorium Property Company Limited (217) and supporting documents RD124-126, objects to Policy AD 1B as in the Modified Proposed Plan the site would be designated as "General Urban Area" and not as a "Commercial Centre". They request that the site be identified as either a "Mixed-use Centre" with scope for Class 1, or within a new definition of "Commercial Centres".

Scottish Government (255) objects to Policy AD 1B, as the policy requires an assessment of impact for proposals for shops over 2,500m^2 in Town and Local Centres. This approach is not consistent with Scottish Planning Policy (AD60), which only requires impacts on assessments outwith town centres.

Scoop Asset Management (290) objects to Policy AD 1B, as it is not considered that 2,500m^2 is the appropriate level of retail development above which the sequential approach should apply in relation to Town and Large Centres and should be changed to 1,000 m^2.

Modifications sought by those submitting representations:

Equorium Property Company Ltd (217) seeks that Mackinnon Mills, Coatbridge, should be identified as a either a "Mixed-use Centre", with scope for Class 1 retail use, or that a new definition of "Commercial Centres" should be added to the definitions of Centres under the Placemaking Policies on page 46 of the Modified Proposed Plan, with Mackinnon Mills included specifically. In addition, the site should be removed from the General Urban Area on Map Book Promote page 9.4 and replaced with a "Mixed-use Centre" or "Commercial Centre" designation.

Scottish Government (255) suggests that Policy AD 1B Amount of Development should

be updated to remove requirements for impact assessments for sites within town centres.

Scoop Asset Management (290) suggests that Policy AD 1B Amount of Development should be amended to read: Box 1 "Shops" should state "over 1,000 m^2…" rather than "2,500 m^2…". The box below should also be amended with "1,000 m^2" replacing "2,500 m^2".

Summary of response by planning authority:

Equorium Property Company Ltd (217) - The Sequential Approach set out in the Modified Proposed Plan reflects the Approved Clydeplan Strategic Development Plan (AD59), under which context none of North Lanarkshire centres can be described as a "commercial centre". The Town and Large Centres are not just retail parks, they incorporate other uses, have more parking, open space, community uses, etc., and are not just selling "bulky goods". The Council's Sequential Approach acknowledges the changing nature and function of retail parks.

The Modified Proposed Plan identifies a network of Mixed-Use Centres, categorised by their different roles and functions. Whilst the site does offer retail, the Council does not consider it fits any of the categories identified within the Mixed-Use Centres network. The Council stresses that this does not present an impediment to future development of the site.

Scottish Government (255) - The wording of AD 1B Guidance reflects the Approved Clydeplan Strategic Development Plan (AD59), as required by Scottish Planning Policy (AD60). The Council does not agree that further changes are needed in respect of this Policy.

Scoop Asset Management (290) - The wording of AD 1B Guidance reflects the Approved Clydeplan Strategic Development Plan (AD59), as required by Scottish Planning Policy (AD60). The Council does not agree that further changes are needed in respect of this Policy.

Reporter's conclusions:

<u>Preliminary note</u>

1. In issue 10 Strategic Town Centres - Purpose of Place, it is recommended that policy 1B be renamed. Instead of "Town & Large Centres", the policy title should be "Other Town Centres".

<u>Mackinnon Mills, Kirkshaws Road, Coatbridge</u>

2. Representation 217 is addressed in issue 12 Town & Large Centres - Purpose of Place.

<u>Requirement for impact assessments</u>

3. Representation 255 refers to the 5,000 square metres threshold for assessment contained in policy AD 1A. This is addressed in issue 11: Strategic Town Centres - Amount of Development.

4. Regarding the 2,500 square metres threshold for assessment contained in policy AD 1B, I agree that Scottish Planning Policy refers to impact assessment only in relation to development that is outwith a centre and contrary to the development plan, but I am not aware of any provision in Scottish Planning Policy that advises against impact assessment in other circumstances. Paragraph 70 of Scottish Planning Policy includes the following.

> "New development in a town centre should contribute to providing a range of uses and should be of a scale which is appropriate to that centre. The impact of new development on the character and amenity of town centres, local centres and high streets will be a material consideration in decision-making."

I find that this indicates that impact assessment in other circumstance may be appropriate.

5. My conclusion is that there is no need to remove from AD 1B a requirement for impact assessments.

<u>The 2,500 square metres threshold</u>

6. A representation has asserted that the 2,500 square metres threshold in policy AD 1B is not appropriate and not justified, stating: "If arbitrary figures are to be used then it is suggested that over 1,000 square metres would be more appropriate."

7. I note that Clydeplan (page 94, schedule 14) contains the same 2,500 square metres threshold. For this reason my conclusion is that, in policy AD 1B, the threshold should remain as 2,500 square metres.

Reporter's recommendations:

No modifications required.

Issue 014	**Local Business Centres**	
Development plan reference:	PP2B Policy and Guidance AD2B Policy and Guidance Pages 62 – 63	**Reporter:** Robert Maslin
Body or person(s) submitting a representation raising the issue (including reference number):		
Ediston Properties Ltd (248) In-Site Property Solutions (263)		
Provision of the Development Plan to which the issue relates:	2B Local Business Centres Policy PP 2B Purpose of Place North Lanarkshire Council will encourage small, medium and large sized enterprises to locate in Local Business Centres, safeguard their character from dilution by other, inappropriate uses. Policy PP 2B Guidance Applicants will be expected to provide identified appraisals or assessments. Policy AD 2B Amount of Development Applications for new development will be assessed for their implications related to the amount of development proposed. Policy AD 2B Guidance Applicants will be expected to provide identified appraisals or assessments. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		

Policy PP 2B

Ediston Properties Ltd (248) and supporting document RD212, objects to the proposal to allocate the site of B&Q, Caldeen Road, Coatbridge, as a Local Business Centre, on the grounds that the site is an established retail site and there have been no changes in circumstances to alter the position. There is no requirement for additional business and industrial land to be allocated and the Council's own policy AD 2B confirms that comparison retail is not an appropriate use at business centres (page 63).

In-Site Property Solutions (263) objects on the grounds that the Modified Proposed Plan does not continue the practice of recognising the need for investment and support in Flemington Industrial Estate, Motherwell and makes no reference to the preparation of Action Plans to facilitate investment and support, and to the exclusion of all residential-related uses from the list of appropriate uses within Local Business Centres, particularly at their edges as this could restrict potential cross-funding required to support investments in improvements and growth.

Policy AD 2B

In-Site Property Solutions (263) No additional representation provided.

Modifications sought by those submitting representations:

Policy PP 2B

Edison Properties Limited (248) seeks the removal of the site as a Local Business Centre.

Policies PP 2B and AD 2B

In-Site Property Solutions (263) seeks that provision is made in the LDP for the preparation of Action Plans to support Local Business Centres and amend Policy PP 2B Purpose of Place Policy and the associated Guidance to allow for appropriate development, where it is demonstrated that cross funding will improve the potential to secure enhancement to the employment opportunities at the industrial estate, provided that the alternative uses do not affect the operation of the Local Business Centre, specifically all Class 1, Class 7, Class 8 Residential Institutions and Class 9 Housing, and flats (including student accommodation) should also be considered appropriate in principle.

Summary of response by planning authority:

Policy PP 2B

Edison Properties Limited (248) - The Council no longer recognises isolated, large, single-user retail stores as constituting any form of commercial centre. This is not an impediment to continued retail use at these locations. Whilst the site does offer retail, the Council does not consider that it fits any of the categories identified within the Mixed-Use Centres network. The Council does not accept that further changes are needed in respect of this policy.

In-Site Property Solutions (263) - The Council considers that it is explicit in the allocation of specific business and industrial sites within both Strategic and Local Business Centre designations that these are locations that will continue to be supported, as this is to where new development is being directed. Flemington Industrial Estate is recognised as a locally important employment site and is therefore included within the Local Business Centre designation. The purpose of this Policy is to ensure that Local Business Centres are given priority in terms of industrial, business and infrastructural investment, but allows enough flexibility to support the operation of the centre, by encouraging appropriate ancillary development whilst offering protection from unrelated non-industrial uses. The purpose of the Places for Business & Industry Charrette (AD30) was to review the current supply of business and industrial (B&I) land across North Lanarkshire and develop a new policy framework that best reflects good place making principles and supports the wider spatial objectives of the Plan.

As part of that review of the suitability of locations for business and industry, existing industrial estates were subject to site assessment Places for Business and Industry Charrette (AD30) (Appendix 2, p.44). Based on the results of its place making qualities, the assessment found that for Flemington Industrial Estate, there were good opportunities for upgrading of existing stock and for smaller units for start-ups, but larger units and potential mixed use including housing were not appropriate at this location.

Policy AD 2B

In-Site Property Solutions (263) - The policy includes a requirement for applicants to provide the identified appraisals or assessments as part of any forthcoming planning applications to support why a proposal is appropriate at that location and how it will support the operation of that centre. The Council does not consider that any further policy wording is required to this effect.

Reporter's conclusions:

B&Q, Caldeen Road, Coatbridge

1. Matters raised in representation 248 are addressed in issue 12, where it is recommended that the B&Q site be designated as a commercial centre.

Flemington Industrial Estate, Motherwell and local business centres in general

2. The proposed plan designates Flemington Industrial Estate as a business centre. I take it that policies PP 2B and AD 2B: Local Business Centres apply to this designation. Policy PP 2B:

- supports upgrading of premises, amenities, access, parking and green spaces;
- permits a full range of Class 4 Business, Class 5 Industrial and Class 6 Storage or Distribution uses; and
- permits appropriate ancillary development.

3. I find nothing in the policy that would prevent preparation of an action plan, should there be resources and a desire to do this. I find it likely that the council would welcome any proposal to prepare an action plan if the purpose of the plan were to identify and implement the kinds of upgrading to which policy PP 2B refers.

4. Policy PP 2B could be amended to require preparation of action plans, but this would be no more than a paper exercise if there are no resources to prepare such plans and to implement their proposals. The representation does not identify such resources.

5. My conclusion is that it is neither necessary nor desirable for the proposed plan to include a requirement for action plans.

6. Regarding the appropriateness of uses such as shops, hotels, residential institutions and houses, I find that, in principle, uses of these kinds are not appropriate in an area designated as a business centre. Shops and hotels should be encouraged to locate in town centres, in accordance with policies PP 1A and PP 1B of the proposed plan and in accordance with the approach prescribed in the Promoting Town Centres section of Scottish Planning Policy. Residential uses could be adversely affected by neighbouring industrial activity and in turn could inhibit continuing industrial activity. Such uses are likely to be contrary to the part of policy PP 2B that seeks to protect the character of business centres from dilution by other uses.

7. It is possible that a particular non-conforming development within a business centre would have beneficial effects so great as to justify a departure from policy. This possibility does not mean that the policy should be altered.

8. My conclusion is that policy PP 2B should not permit the additional kinds of development contained in the representation.
Reporter's recommendations:
No modifications required.

Issue 015	**Visitor Economy Areas & Locations**	
Development plan reference:	PP2C Policy and Guidance AD2C Policy and Guidance Pages 65 - 66	**Reporter:** Sue Bell
Body or person(s) submitting a representation raising the issue (including reference number):		
Scottish Natural Heritage (SNH) (272) Joeswood Estates Ltd (285)		
Provision of the Development Plan to which the issue relates:	2C Visitor Economy & Locations Policy PP2C Purpose of Place North Lanarkshire Council will support the provision of tourism and leisure facilities in the Visitor Economy Locations Policy PP 2C Guidance Applicants will be expected to provide identified appraisals or assessments. Policy AD 2C Amount of Development Applications for planning permission for new development will be assessed for their implications related to the amount of development proposed. Policy AD 2C Guidance Applicants will be expected to provide identified appraisals or assessments. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		
Policy PP 2C Joeswood Estates Ltd (285.389) and supporting documents RD247-248, objects to the omission of land to the south of Gartloch Road, Gartcosh, (Joeswood Site 2) (SM005) as a proposed development site. Policy AD 2C SNH (272) objects on the grounds that this Policy relates to specific locations, including Palacerigg Country Park, the boundary of which partially overlaps with the Slamannan Plateau Special Protection Area (SPA) and is immediately adjacent to the West Fannyside Moss Special Area of Conservation (SAC). Depending on how this Policy is implemented, it could have a likely significant effect on the SPA and/or SAC.		
Modifications sought by those submitting representations:		
Policy PP 2C Joeswood Estates Ltd (285.389) seeks the allocation of Site 2 (SM005) as an opportunity for a commercial/leisure development site.		

Policy AD 2C

SNH (272) seeks to ensure that there is no adverse effect on the integrity of the Slamannan Plateau Special Protection Area and/or West Fannyside Moss Special Area of Conservation, by recommending the addition of the following caveat to this Policy : "With regard to any proposed development at Palacerigg Country Park, planning permission will only be granted if there would be no adverse effect on the integrity of the Slamannan Plateau SPA and/or West Fannyside Moss SAC, either alone or in combination with other plans or projects".

Summary of response by planning authority:

Policy PP 2C

Joeswood Estates Ltd (285.389) - Whilst the Council is supportive of the provision of tourism and leisure facilities in principle, it considers that there is no requirement to allocate any land at this location for this specific use, as it lies out with the Plan's identified Visitor Economy Areas and Locations identified in the Plan.

Policy AD 2C

SNH (272) - The Plan clearly states that any proposal is subject to an assessment against legislation and other Policies in the Plan. The EDQ Policies of the Plan set out a three-pronged assessment approach that balances the location and characteristic of developments with the economic, social and environmental objectives, as set out by Scottish Planning Policy (AD60). It would appear that SNH (272) may have checked the Policy AD 2C box on the proforma by mistake and that its real intention was to lodge an objection to Policy PP 2C.

The wording of Policy PROT A is specific in safeguarding all Natura 2000 sites from all potentially harmful impacts. This gives flexibility for the same level of protection to be afforded to any additional Natura 2000 sites that SNH may wish to designate during the Plan Period, so is far more robust than being anchored to a limited number of sites that exist at a particular moment in time. However, to be consistent with the Council's response to the SNH (264) suggested wording change dealt with at Issue 29, should the Reporter find it acceptable, the Council proposes to add an asterisk at page 65 alongside the Palacerigg Country Park, Cumbernauld, in the Policy PP 2C Visitor Economy Areas column, along with the explanatory footnote to page 65 "*Any development proposals must take Policy PROT A Category A1 into account and, to be in accordance with the Plan, comply with the requirements of the South Cumbernauld Community Growth Area Strategic Development Framework." As a consequence, the wording requested by SNH (272) would be contradictory to the aims of the Policies PROT A and PP 2C and the Council does not consider that to be an appropriate additional change.

Reporter's conclusions:

Joeswood Estates Ltd

1. The representation in relation to the land to the south of Gartloch Road, Gartcosh (Joeswood Site 2) (SM005) is addressed as part of Issues 4 and 17.

Palacerigg Country Park Cumbernauld Visitor Economy Area

2. The representation from Scottish Natural Heritage (SNH) (now known as NatureScot) relates to the potential effects of the policy on two designated sites (Slamannan Plateau Special Protection Area (SPA) and West Fannyside Moss Special Area of Conservation (SAC)). The council's response refers to NatureScot's comments reported under issue 29, concerning the likely effects of two housing allocations on Slamannan Plateau SPA. The council proposes that its proposed modification to address NatureScot's comments under issue 29 should also be applied to policy PP 2C.

3. NatureScot's comments under issue 29 relate to the habitats regulations appraisal (HRA) of the modified proposed plan and its views on the conclusions of that assessment, which were contained in a separate letter (dated 3 April 2019). I therefore requested a copy of that advice to be supplied. In that letter, NatureScot states that it is unable to agree with the conclusions of the council's HRA record. One of the reasons for this disagreement is in relation to the screening of policy PP 2C. The council has provided an 'HRA – Explanatory Note' (AD20), which confirms that there is one remaining outstanding issue between the council and NatureScot concerning the findings of the HRA. This relates to policy PP 2C.

4. I therefore issued a further information request, in order to obtain further detail and clarification about this outstanding objection from NatureScot and how it relates to policy PP 2C.

5. In its representation, NatureScot has recorded an objection against policy AD 2C 'Amount of Development'. The council interpreted this as an error, treating the comments as a response to policy PP 2C. In response to my further information request, NatureScot has confirmed this to be correct. Therefore, my comments below relate to policy PP 2C.

6. In its response to my further information request, NatureScot has advised that as a result of the UK's departure from the European Union, 'Natura 2000' sites should now be referred to as 'European sites'. It has explained that whilst such sites no longer form part of the 'Natura 2000' network, they continue to contribute to the European and UK-wide network of designated sites. Therefore, in my discussion below, I use the term 'European sites' and recommend that this term is used to replace the term 'Natura 2000' site throughout the modified proposed plan including the glossary.

7. Having considered all the information before me, it seems that there are several elements to NatureScot's objection. These relate to the need for and wording of modifications in order to safeguard European sites from any likely significant effects arising from policy PP 2C; the acceptability of relying on a general protective policy to safeguard European sites; and the process by which those modifications are determined.

8. European sites receive particular protection through the requirements of The Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the 'Habitats Regulations'). The effect of these in relation to local development plans is set out in paragraphs 100 – 104 of planning circular 6/2013 Development Planning.

9. Before giving consent to a land use plan that is likely to have a significant effect on a European site (either alone or in combination with other projects and plans), the planning authority should carry out an 'appropriate assessment' of the implications for the

European site(s) in view of the site's conservation objectives. The process of determining whether an 'appropriate assessment' is required (sometimes referred to as 'screening') as well as any 'appropriate assessment' is known as 'habitats regulations appraisal'. Where an appropriate assessment is required, the planning authority cannot adopt the plan without having consulted and taken account of advice from NatureScot.

10. The council's HRA record indicates that policy PP 2C has been 'screened out' of the need for an appropriate assessment. Justification for this is set out in table 1 of that document and in the council's response set out above. In its response to the HRA report dated 3 April 2019, NatureScot states that policy PP 2C "should not be screened out as the development it promotes is specific to the allocations." It further notes that Palacerigg Country Park partially overlaps with the boundary of the Slamannan Plateau SPA and is immediately adjacent to the West Fannyside Moss SAC. In addition, the letter states: "While the effects of the policy will depend on how it is implemented in due course, through the development management process, there may be a possibility that if implemented in one or more particular ways, the policy could have a significant effect on the SPA or SAC. The policy cannot therefore be screened out in Stage 5; and in the appropriate assessment the uncertainty of the policy outcome will remain unless it can be removed by an amendment to the plan."

11. In screening the policy out of the need for an appropriate assessment, the council is relying upon the provisions of policy PROT A Natural Environment & Green Network Assets, and on proposed amended wording in the modified proposed plan. NatureScot does not agree with the proposed approach or wording. In response to my further information request it has again indicated that it believes that appropriate assessment is required, prior to adding any policy caveat. In support of this view, it has referred to its advice in relation to the 2018 'People Over Wind CJEU judgement'. Thus, I have firstly considered the council's approach before turning to a detailed consideration of its proposed modification to the text.

12. The requirements of the habitats regulations are clear: any element of a project or plan that will give rise to likely significant effects upon one or more European sites (either alone or in combination with other projects and plans) must be subject to an appropriate assessment.

13. Policy PP 2C relates to specific locations where proposals for tourism and leisure facilities will be supported. Whilst the policy is non-specific in terms of the type of development that may come forward, there is a clear possibility that proposals could come forward at Palacerigg Country Park that would be likely to have significant effects upon either Slamannan Plateau SPA and/or West Fannyside Moss SAC. That is, the effect of the policy will depend on how it is implemented and hence it cannot, with certainty, be screened out as having likely significant effects. In such circumstances, the habitats regulations require that an appropriate assessment is undertaken.

14. The council considers that policy PP 2C was screened out based on its proposed policy modification being included within the modified proposed plan (the content of which, I consider further below). The council maintains that its proposed wording addresses any concerns relating to proposals at Palacerigg Country Park. That is, following its procedure set out in paragraph 2.1 of its HRA record, the council has applied mitigation to the policy, prior to re-screening it and concluding that it does not require appropriate assessment. NatureScot's revised guidance following the 2018 'People Over Wind CJEU judgement' is that such an approach is no longer valid. Mitigation, including

policy caveats, can only be added to remove uncertainty during the appropriate assessment and should not be used as a mechanism to screen policies out of the need for appropriate assessment.

15. The wording of policies may go through several iterations before attaining a settled view for incorporation in a proposed plan. Thus, it could be argued that a policy modification is part of that general evolutionary process. However, in this instance, the council has clearly stated that the modification is required to remove any uncertainty about the effects of the policy on European sites. I therefore conclude that the council's modified proposed wording constitutes 'mitigation'. Thus, following NatureScot's guidance, any mitigation policy caveat should only be added once the policy has been subject to appropriate assessment.

16. To aid clarity to the policy, the council initially proposed that the wording should be modified, in line with its proposed modification in relation to the area strategy for Cumbernauld and Kilsyth addressed under issue 29. It proposed adding an asterisk against Palacerigg Country Park, with the footnote to require developments to take policy PROT A Category A1 into account and, to be in accordance with the plan, to comply with the requirements of the South Cumbernauld Community Growth Area strategic development framework.

17. In its response to my further information request, the council has confirmed that reference to the South Cumbernauld Community Growth Area strategic development framework was an error. It explained that this document was approved by the council as supplementary planning guidance in 2016. It would not, however, be part of the modified proposed plan once it is adopted. It would be non-statutory planning guidance and would be used as a material consideration in future planning decisions within the South Cumbernauld Community Growth Area.

18. NatureScot has indicated that it does not consider that reference to the South Cumbernauld Community Growth Area strategic development framework would be adequate to address its concerns in relation to policy PP 2C, as Palacerigg Country Park does not lie within the Community Growth Area identified in the framework. In addition, it notes that the potential source of effects arising from policy PP 2C may be greater than those currently identified within the framework. In particular it notes that the consideration of impacts of habitats within the SPA or impacts on the SAC are not explicit requirements of the framework.

19. The council has already indicated that it no longer wishes to insert a reference to the South Cumbernauld Community Growth Area strategic development framework. In any case, as this document does not form part of the modified proposed plan, I do not consider that it has sufficient status to ensure that only developments that would not have an adverse effect on the integrity of the European sites were supported. That is, it would fail to remove the uncertainty about the effect of the policy.

20. The council considers that policy PROT A of the modified proposed plan would safeguard all European sites including any new sites designated in the future, and hence be more robust than limiting policy PP 2C to specific named sites. It has also proposed that policy PP 2C should be modified by the addition of an asterisk by 'Palacerigg Country Park' to be supported by the wording: "Any proposals at Palacerigg Country Park will be assessed against Policy PROT A Natural Environment & Green Network."

21. NatureScot recommends that plan-making bodies do not rely on a general protective policy within a plan to safeguard internationally designated sites. In response to my further information request, it states: "If one aspect of a plan would be likely to have a significant effect on a European site, it is not appropriate to ascertain at the appropriate assessment stage that there would not be an adverse effect on site integrity simply because there is another policy saying that such sites would be protected. The inherent tension, conflict, or contradiction between the two aspects of the plan must be resolved in a way that enables the plan-making body to ascertain that there would not be an adverse effect on the integrity of the European site, with the appropriate degree of certainty."

22. I not persuaded by the council's argument that the three-pronged assessment approach established by the EDQ policies, which it considers balances the location and characteristic of developments with the economic, social and environmental objectives, provides an appropriate safeguard for European sites. Nor am I satisfied that the revised proposed wording promoted by the council, which contains an explicit reference for the need for proposals at Palacerigg Country Park to be assessed against policy PROT A would act to effectively cancel out any likely significant effects that would potentially arise through policy PP 2C. The modified proposed plan has to be read as a whole. It is not uncommon for development proposals to gain support from some polices within a plan, whilst failing to satisfy others. In such cases, the decision-maker has to balance these different elements to reach a decision. I do not find that to be consistent with the requirements of the habitats regulations. These are unambiguous in stating that projects and plans that would have an adverse effect on the integrity of a European site (either alone in combination with other projects and plans) cannot be consented except under very limited and specific circumstances. This establishes a narrower scope for consent than under the usual balancing duties of a planning authority. For that reason, I accept NatureScot's view that reliance on a general protective policy would introduce tension into the plan. It would potentially set the requirements of policy PP 2C against the requirements of policy PROT A.

23. For the same reasons, I do not find that reliance should be placed upon the requirement within policy PP 2C that "All proposed development will be subject to assessment against legislation and other Policies in the Plan".

24. In addition, as the council itself has stated, policy PROT A is a 'catch-all' policy, designed to apply to each and every relevant development proposal brought forward under the modified proposed plan. In the case of policy PP 2C, there is a known potential risk to two European sites from development proposals associated with Palacerigg Country Park. Given that this risk is known and acknowledged, I see no reason not to include cognisance of that within Policy PP 2C, thereby bringing it to the attention of potential developers and removing any possible tension with policy PROT A. I accept NatureScot's suggestion that this risk should be incorporated into the policy rather than the explanatory text, as I consider that this indicates the significance of the requirement.

25. In its response of 3 April 2019 to the HRA record, NatureScot noted that the uncertainty of the policy outcome will remain within the appropriate assessment, unless it can be removed by an amendment to the plan. To achieve this, NatureScot has suggested the addition of a specific policy caveat: "With regard to any proposed development at Palacerigg Country Park, planning permission will only be granted if there would be no adverse effect on the integrity of the Slamannan Plateau SPA or West Fannyside Moss SAC, either alone or in combination with other plans or projects."

26. The council does not support the proposed modified wording and considers that the wording requested by NatureScot would be contradictory to the aims of policies PROT A and PP 2C. I am not persuaded by this argument. I accept NatureScot's view that it is necessary to ensure that implementing the policy in ways that would affect the integrity of the European sites would not be in accordance with the modified proposed plan. The proposed modified wording supplied by NatureScot does not prohibit or seek to discourage proposals within the visitor economy area of Palacerigg Country Park. It does, however, only provide support for those proposals which would not have an adverse effect on the integrity of the named European sites. This is wholly consistent with the requirements of the habitats regulations and the requirements of policy PROT A category A1 in providing a safeguard for sites of European importance.

27. I have therefore, set out below revised policy wording, which takes into account the comments raised by NatureScot. In doing so, I am conscious that NatureScot's view is that any policy caveat should only be added, once the policy has been subject to an appropriate assessment.

28. Responsibility for the appropriate assessment lies with the 'competent authority', which is the body that authorises the plan. In this instance, the 'competent authority is North Lanarkshire Council, not the Scottish Government. The council has prepared a draft HRA record. As, under the habitats regulations, the council is not able to formally adopt the modified proposed plan without considering the need for it to be accompanied by an appropriate assessment, the HRA record would need to be finalised in the light of the findings of this examination. This provides the opportunity for the council to consider whether or not to subject policy PP 2C to an appropriate assessment.

29. Whilst the overall outcome, in terms of the modified proposed wording of the policy may not be affected by whether or not an appropriate assessment is conducted, there is a clear stated procedure for considering the effects of a plan or project on European sites. It may be that there are other aspects of the proposal, which are considered at the appropriate assessment stage, which would not have been identified at the screening stage.

30. Section 2b of The Town and Country Planning (Grounds for Declining to Follow Recommendations) (Scotland) Regulations 2009 allows local authorities to decline to accept a modification where the adoption of the modified local development plan would not be compatible with the requirements of part IV A of the habitats regulations. This would enable the council to further modify the policy, if required, following an appropriate assessment.

31. In conclusion, I find that the policy PP 2C, as worded, could have likely significant effects on Slamannan Plateau SPA and/or West Fannyside Moss SAC. As such, I would expect that policy to be subject to appropriate assessment. I anticipate, subject to the findings of that appropriate assessment, that a policy caveat could be added to the policy to remove uncertainty about the effects of the policy. I have proposed wording for that policy caveat below. In doing so, I note that responsibility for the appropriate assessment lies with the competent authority, which in this instance is North Lanarkshire Council.

Reporter's recommendations:

1. Wherever the term 'Natura 2000' appears within the plan, it should be replaced with the term 'European site'.

2. In the Glossary, remove the term 'Natura 2000' and insert the term 'European site'. This should be defined as follows: "Generic term used to refer to sites which were formerly known as 'Natura 2000' sites. Following the UK's departure from the European Union, these sites continue to contribute to the European and UK-wide network of designated sites and to fulfil the objectives of the EU Habitats and Birds Directives through the Habitats Regulations. These sites include areas identified as Special Areas of Conservation (SAC) or Special Protection Areas (SPA)."

3. On page 65 of the Plan, under PP 2C Purpose of Place Policy Guidance box, in the right hand column, insert the following text prior to the last sentence ("All proposed development…. in the Plan":

> "With regard to any proposed development at Palacerigg Country Park, planning permission will only be granted if there would be no adverse effect on the integrity of the Slamannan Plateau SPA and/or West Fannyside Moss SAC, either alone or in combination with other plans or projects."

Issue 016	**General Urban Area**	
Development plan reference:	PP3 Policy and Guidance AD 3 Policy and Guidance Pages 68 - 70	**Reporter:** Robert Maslin
Body or person(s) submitting a representation raising the issue (including reference number):		
Ogilvie Homes (188) Ogilvie Homes (189) Equorium Property Company Limited (217) Wallace Land Investments (220) Goldcrest Partners LLP (246) Central Scotland Green Network Trust (254) Sir Frank Mears Associates (261) Rhiannon Properties Ltd (286)		
Provision of the Development Plan to which the issue relates:	3 General Urban Area Policy PP 3 Purpose of Place North Lanarkshire Council seeks to maintain and improve the level of amenity in urban areas. Policy PP 3 Guidance Applicants will be expected to provide identified appraisals or assessments. Policy AD 3 Amount of Development Applications for planning permission for new development will be assessed for their implications related to the amount of development proposed. Policy AD 3 Guidance Applicants will be expected to provide identified appraisals or assessments. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		
Policy PP 3 Ogilvie Homes (188.235) and supporting documents RD018-026, objects to the change to the settlement boundary at Westerwood Golf Club (SM031) on the grounds that the site was allocated as proposed Housing development Site 09/02F (CfS/MIR Site 0009/02) and included within the General Urban Area in the Proposed Plan, but is designated as Green Belt in the Modified Proposed Plan. Ogilvie Homes (188.237) and (188.238) and supporting documents RD027-040, object to the exclusion of Site A Dunning Drive, Cumbernauld (SM032) (CfS/MIR Site 0007/02), and Site B Dunning Drive, Cumbernauld (SM033) (CfS/MIR Site 0008/02) from the General Urban Area on the grounds they are infill sites. Ogilvie Homes (189), Wallace Land Investments (220), Goldcrest Partners LLP (246) and Rhiannon Properties Ltd (286) object to the vagueness of this Policy relating to "Layout of Development", on the grounds that it is not considered appropriate for detailed aspects to		

be contained wholly within associated guidance.

Equorium Property Company Limited (217) and supporting documents RD124-126, objects to Policy PP 3 and Policy AD 3 on the grounds that in the Modified Proposed Plan the site is designated as ”General Urban Area” and not as a ”Commercial Centre”. It is requested that the site be identified as either a ”Mixed-use Centre” with scope for Class 1, or a new definition of ”Commercial Centres”, in line with paragraph 63 of Scottish Planning Policy (AD60).

Central Scotland Green Network Trust (254) and supporting documents RD213-215, objects to the settlement boundary and housing allocation for the Shotts area (SM006), specifically to the northern boundary, on the grounds that the proposed housing areas identified are limited in scope and scale and their development will impact upon limited greenspace.

Policy AD 3

Sir Frank Mears Associates (261) objects to the expansion of the General Urban Area to the east of Cleland (SM003) including only part of the land put forward, instead it should be extended to include the whole of the site.

Modifications sought by those submitting representations:

Policy PP3

Ogilvie Homes (188.235); (188.237) and (188.238) seek the inclusion of CfS/MIR Sites 0007/02, 0008/02 and 0009/02 within the General Urban Area settlement boundary and their allocation as Proposed Housing Development Sites (SM031, SM032 and SM033).

Ogilvie Homes (189), Wallace Land Investments (220), Goldcrest Partners LLP (246) and Rhiannon Properties Limited (286) seek the amalgamation of the Policy and Policy Guidance.

Equorium Property Company Limited (217) seeks the removal of Mackinnon Mills, Kirkshaws Road, Coatbridge, from the General Urban Area and its identification as either a “Mixed-use Centre” with scope for Class 1 retail use, or that a new definition of “Commercial Centres” be added to the definitions of Centres, with Mackinnon Mills included specifically.

Central Scotland Green Network Trust (254) seeks the amendment of the Shotts settlement boundary to include land as shown on the supporting document “*Hillhouseridge Requested Revision to LDP*” and the allocation of two Proposed Housing Development Sites shown on the appended plan “*Hillhouseridge Requested Revision to LDP*” (SM006).

Policy AD 3

Sir Frank Mears Associates (261) seeks the expansion of the General Urban Area boundary east of Cleland (SM003) to include the whole site put forward.

Summary of response by planning authority:

Policy PP3

Ogilvie Homes (188.235), (188.237) and (188.238) CfS/MIR Site 0009/02 was allocated in North Lanarkshire Local Development plan Proposed Plan in 2017 solely as a result of a review of settlement boundaries. The Council is clear that there is no need to release land for housing in Westerwood. The Council's decision to remove it from the Modified Proposed Plan reflects the lack of need and is supported by several individuals who submitted representations and who had also objected to its inclusion in North Lanarkshire Local Development Plan Proposed Plan on grounds of access and amenity and the lack of need. The Council maintains that sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that this does not represent a sustainable location for any further release. The principle of removing the current Green Belt designation at this location is dealt with under Issue 17 PP 4 Green Belt.

Ogilvie Homes (189), Wallace Land Investments (220), Goldcrest Partners LLP (246) and Rhiannon Properties Limited (286) - The Council considers that the separation of Policy and Guidance is logically and consistently applied throughout the Modified Proposed Plan, with applicants clearly advised to consider all policies of the Plan in making any application for planning permission, such as Policy EDQ 1 Policy Site Appraisal, which sets out sufficient guidance in this respect.

Equorium Property Company Limited (217) - The Sequential Approach set out in the Modified Proposed Plan reflects the Approved Clydeplan Strategic Development Plan (AD59), under which context none of North Lanarkshire centres can be described as a "commercial centre". The Town and Large Centres are not just retail parks, they incorporate other uses, have more parking, open space, community uses, etc., and are not just selling "bulky goods". The Council's Sequential Approach acknowledges the changing nature and function of retail parks.

The Modified Proposed Plan identifies a network of Mixed-Use Centres, categorised by their different roles and functions. Whilst the site does offer retail, the Council does not consider it fits any of the categories identified within the Mixed-Use Centres network. The Council stresses that this does not present an impediment to future development of the site.

Central Scotland Green Network Trust (254) - Matters raised are addressed under Issue 32 Wishaw Local Area Partnership.

Policy AD3

Sir Frank Mears Associates (261) - Proposed Housing Development Site 09/19 was allocated as a consequence of the Places for Business and Industry Charrette (AD30), whereby a number of small industrial and business uses not identified specifically within the hierarchy of Business Locations, were designated as General Urban Area, which allows for flexibility in wholly or partially considering them as being suitable in principle for other uses, including housing. The Council considers that the partial inclusion of this site has been appropriately identified for development in principle.

The Council does not agree that the settlement boundary should be extended as proposed. Extending the settlement boundary in such a way would represent an illogical

expansion of the General Urban Area into the countryside, with no identified need or demand.

Reporter's conclusions:

Settlement boundary at Westerwood Golf Club, Cumbernauld

1. The representation relating to the site at Westerwood Golf Club, is also recorded in issues 17, 18, 22 and 29. My conclusions here take into account the whole of the representation.

2. The representation refers to a previous assessment and an intention to allocate the site for development. The representor refers to residential and other development on three sides of the site and identifies the following considerations as indicating the site's suitability for housing: the proposed development would be attractive and in-keeping with its surroundings; the site is within walking distance of a range of community facilities and public transport; the site should not be included in the green belt because it is bounded on three sides by development, it would not intrude into the green belt, there would be no coalescence and it is not covered by any environmental or land use designations.

3. With regard to need for additional housing, in issue 4, we conclude that the modified proposed plan identifies housing sites in the Cumbernauld housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan.

4. Paragraph 117 of Circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate.

5. Paragraph 119 of Scottish Planning Policy stipulates 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."

6. As the plan meets the requirements laid down in Scottish Planning Policy, there is no imperative for us to consider allocating further housing sites in the Cumbernauld housing market sub-area to ensure the plan is sufficient in regard to its provision of housing land.

7. Regarding whether the site should be in the green belt or in the general urban area, I note that the site has residential development on its north and east sides. The hotel car park and hotel complex are to the south. There is open ground to the west where the site adjoins part of the golf course. The site in conjunction with this open ground contributes to the setting of this part of the town. I find that the balance of advantage lies with including the site in the green belt.

8. In conclusion, there is no imperative to allocate further housing sites at this time in the Cumbernauld housing market sub-area and the site should be included in the green belt. For these reasons, the limitations of the examination outlined in paragraph 117 of Circular 6/2013 apply. As the allocation of this site for housing and its exclusion from the green belt are not required to address an inappropriate or insufficient aspect of the proposed plan, there is no basis for me to recommend that the proposed plan be altered.

Sites A and B, Dunning Drive and St Andrew's Drive, Cumbernauld

9. Representations 188.237 and 188.238 (sites A and B, Dunning Drive and St Andrew's Drive, Cumbernauld) are also recorded in issues 4, 17, 18, 22 and 29. My conclusions here take into account the whole of the representations.

10. Sites A and B are part of a larger area that is owned by the representor. There are separate representations in support of development on each site. The representations contain similar arguments. The council's response to the representations is included in its response to the foregoing Westerwood Golf Course site representation. I find it appropriate to consider sites A and B together.

11. In the current adopted local plan, sites A and B are designated as part of a community facilities area. In the proposed plan, they are shown as part of the green belt.

12. Representations 188.237 and 188.238 include the following points. The sites are within a gap site. There is existing residential development to the west and east. Westerwood Hotel is to the north. A garden centre is to the south-east. The sites are unkempt. They are free of constraints. Development would not lead to coalescence. The sites are distinctly urban in character. There is commitment to create linkages and a community park. The sites are relatively close to and within walking distance of community facilities. Utility services are available. The sites would contribute to an effective and generous supply of housing land. The sites should be part of the general urban area and should be allocated for housing.

13. Regarding making a contribution to an effective and generous supply of housing land, in issue 4 we conclude that the modified proposed plan identifies sufficient land in the Cumbernauld housing sub-market area to meet the housing land requirements specified in Clydeplan.

14. Paragraph 117 of Circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate.

15. Paragraph 119 of Scottish Planning Policy stipulates 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."

16. As the plan meets the requirements laid down in Scottish Planning Policy, there is no imperative for us to consider allocating further housing sites in the Cumbernauld housing market sub-area to ensure the plan is sufficient in regard to its provision of housing land. Thus the limitations in paragraph 117 of Circular 6/2013 apply. Allocation of the two sites is not required to address an inappropriate or insufficient aspect of the proposed plan. For this reason, there is no basis for me to recommend that the plan be modified for the purposes of housing development.

17. Regarding whether the sites should be in the green belt or in the general urban area, I find that the area between Dunning Drive and St Andrew's Drive is somewhat larger than the usual concept of a gap site. The sites are partly surrounded by land that is designated as general urban area in the proposed plan, but there is a degree of openness to the north.

18. Site inspection reveals that site A is maintained as a mown grass area. Site B appears not to be subject to a maintenance regime. The sites appear to be accessible for informal recreation. I find that they make a positive contribution to safeguarding local identity and acting as open space.

19. I find that the balance of advantage lies with including the sites in the green belt.

20. My overall conclusion is that, in response to the two representations, there is no need to alter the proposed plan.

Whether guidance should be included in policy PP3

21. Representations say that, while the proposed plan, at policies EDQ1 to EDQ3, sets out considerations to promote design quality, the plan does not contain any policy relating to "Layout of Development".

22. I note that matters relevant to layout are included in the site appraisal section of policy EDQ1. Among other things, policies EDQ1 to EDQ3 refer to Scottish Planning Policy and "Designing Streets". These documents offer guidance on the layout of development.

23. The representations do not include details of what should be said in a policy for layout of development. I find it unlikely that good layout design can be achieved by prescriptive policy. Good design can be encouraged by guidance such as that in the "Placemaking" section of Scottish Planning Policy (paragraphs 36 to 57).

24. My conclusion is that the proposed plan need not be altered.

Mackinnon Mills

25. The matters raised in this representation are addressed in issue 012: Town and Large Centres - Purpose of Place.

Settlement boundary and housing sites at Shotts

26. The matters raised in this representation are addressed in Issue 32 Wishaw Local Area Partnership.

Land east of Biggar Road, Cleland

27. The representation relating to the site east of Biggar Road, Cleland is also recorded in issues 3, 4, 6, 8, 9 and 18. My conclusions here take into account the whole of the representation.

28. In response to an informal request for further information, the council confirmed that representation 261 consists solely of the submitted representation form. There is no additional documentation.

29. So far as I am aware, the site was not included in the Main Issues Report, has not been the subject of public consultation and has not been subject to strategic environmental assessment. Paragraph 118 of Circular 6/2013: Development Planning says:

> "Reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites."

In the circumstances, it would not be appropriate to recommend altering the proposed plan in response to the representation.

Reporter's recommendations:

No modifications required.

Issue 017	**Green Belt - Purpose of Place**	
Development plan reference:	PP4 Green Belt Purpose of Place Policy and Guidance Page 73	**Reporter:** Robert Maslin

Body or person(s) submitting a representation raising the issue (including reference number):

Taylor Grange Developments (170) Newhouse Investments Ltd (187) Ogilvie Homes (188) Ogilvie Homes (189) Ogilvie Homes (190) Walker Group (Scotland) Ltd (192) Manus O'Donnell (202) Arrandale Ltd (204) Hallam Land Management (209) WB Properties Ltd (212) Chepstow (Holdings) Ltd (214) Stewart Milne Homes (216) Taylor Wimpey Strategic Land (218) W H Sawyers (224) Taylor Wimpey (225) Uplands Developments Ltd (226)	Barratt Homes West Scotland (231) Kapital Residential Ltd (234) Robertson Homes (238) T Gorman Haulage Ltd (239) Miller Homes (258) Trustees of Miss I D Meiklam (262) Barratt Homes West Scotland & CALA Homes (West) Ltd (264) Homes for Scotland (266) Scottish Natural Heritage (SNH) (272) Orchard Brae Ltd (278) Ravenscraig Ltd (283) Joeswood Estates Ltd (285) William Grant & Sons (291) Woodend Farm (292)

Provision of the Development Plan to which the issue relates:	4 Green Belt Policy PP 4 Purpose of Place North Lanarkshire Council will protect the setting of communities, support regeneration by directing growth to urban areas, protect natural assets and provide a high quality environment, by promoting a Green Belt as defined on the Proposals Map. Policy PP 4 Guidance Applicants will be expected to provide the identified appraisals or assessments, which should be submitted with any planning application to allow consideration of the proposal. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

Planning authority's summary of the representation(s):

Related to Housing

Ogilvie Homes (188.235) and supporting documents RD018-RD026; Ogilvie Homes (188.237) and supporting documents RD027-RD033; Ogilvie Homes (188.238) and supporting documents RD034-RD040; Ogilvie Homes (189) and supporting documents RD041 & RD042, and Ogilvie Homes (190) and supporting documents RD043-RD045 object to CfS/MIR Sites 0009/02 Westerwood Golf Club, Cumbernauld (SM031), 0007/02 Site A Dunning Drive, Cumbernauld (SM032), 0008/02 Site B Dunning Drive, Cumbernauld (SM033), 0006/02 King's Drive, Cumbernauld (SM028 and SM029), and 0012/19 Knownoblehill, Cleland (SM034), being designated as Green Belt.

Walker Group (Scotland) Ltd (192) and Homes for Scotland (266) and supporting documents RD235-RD237,object to the drawing of the Green Belt boundary without a

proper assessment of the areas proposed to be designated as Green Belt and the reference to the Green Belt in policy is unclear. Walker Group (Scotland) Ltd (192) also objects to CfS/MIR Site 0010/02 North Muirfield Farm, Westerwood, Cumbernauld (SM037), being designated as Green Belt.

Manus O'Donnell (202), Barratt Homes West Scotland (231.305) and supporting documents RD187-RD195, and Barrett Homes West Scotland & CALA Homes (West) Ltd (264) and supporting documents RD235-RD237, object to lack of flexibility within the Policy to allow for Green Belt release for housing when there is a failure in the 5-year effective housing land supply in line with the Strategic Development Plan (AD59) and Scottish Planning Policy (AD60). SNH (272) objects to wording in second paragraph of PP 4 Guidance on page 73 of the Policy Document on the grounds that it is considered to be too general/open-ended.

WB Properties Ltd (212.401) and supporting documents RD086-RD094, objects to land on Wishaw Low Road, Cleland (SM009 and SM010), south of Glen Noble, being designated as Green Belt.

Chepstow (Holdings) Ltd (214.272) and supporting documents RD095-RD099; (214.315) and supporting documents RD100-RD103; (214.316) and supporting documents RD 104-RD108 and (214.318) and supporting documents RD109-RD112 object to CfS/MIR Sites 0002/15 Kirklees Road, Mossend (SM035), 0022/05, 0023/05 and 0024/05 Glaudhall Farm, Mount Ellen (SM036), being designated as Green Belt.

Stewart Milne Homes (216.274) and supporting documents RD114-RD118 and (216.313) and supporting documents RD119-RD123, object to land west of Proposed Housing Development Site 03/08 being designated as Green Belt and the non-allocation of CfS/MIR Site 0020/05 Burnbrae Road, Auchinloch (SM039), as a Proposed Housing Development Site.

Taylor Wimpey Strategic Land (218) and supporting document RD127 and Taylor Wimpey (225.283) and supporting documents RD152 & RD153; Taylor Wimpey (225.300) and supporting documents RD157 & RD158, and Taylor Wimpey (225.306) and supporting documents RD154-RD156, object to the CfS/MIR Sites 0003/13 Newlands Farm, Uddingston (SM040), 0006/19 Branchal Road, Cambusnethan (SM019), 0011/05 & 0012/05 Whitehill Farm, Stepps (SM020), and 0015/07 Glenmavis Road/Meldrum Mains, Glenmavis (SM021), being designated as Green Belt.

Uplands Developments Ltd (226) and supporting documents RD159 &RD160, objects to CfS/MIR Site 0007/05 Cumbernauld Road/Woodhead Road, Muirhead (SM030), being designated as Green Belt.

Kapital Residential Ltd (234) and supporting documents RD197 & RD197, objects to insufficient allocation of residential development land being brought forward for low cost affordable housing.

Robertson Homes (238) and supporting document RD200, objects to the Green Belt boundary around Auchinloch.

T Gorman Haulage Ltd (239) objects to CfS/MIR Site 0017/07 Theodore Fields, Burnhead Road, Airdrie (SM038), being designated as Green Belt.

Miller Homes (258) and supporting documents RD218-RD220, objects to CfS/MIR Site

0002/05 Craigendmuir, Dorlin Road, Stepps (SM041), being designated as Green Belt.

Hallam Land Management (209) objects to the inclusion of Dullatur Golf Course (SM007) within the Green Belt boundary.

Ravenscraig Ltd (283) objects to the boundary of the designated Green Belt at Chapelknowe Road Carfin (SM008).

Woodend Farm (292) and supporting document RD251, objects to land surrounding Woodend Farm (SM042) (incorporating CfS/MIR Site 0007/01) being designated as Green Belt.

Related to Business & Industry

Arrandale Ltd (204) and supporting documents RD052-RD063, and Newhouse Investments Ltd (187) and supporting documents RD256 & RD257, object to sites south of Edinburgh Road, Newhouse, and incorporating CfS/MIR Site 0001/12 Newhouse, being designated as Green Belt (SM001 and SM026).

Trustees of Miss I D Meiklam (262) and supporting document RD227, object to the derelict Orchard Farm (SM011) steading site lying between the A8, M8 and rail line at Euro Central being site designated as Green Belt.

Joeswood Estates Ltd (285.388) and supporting document RD247, and (285.389) and supporting document RD248, object to parts of sites at Gartloch Road, Gartcosh (Joeswood Site 1) (SM012) being designated as Green Belt.

William Grant & Sons (291.400) and supporting document RD250 objects to land to the west of its premises at Strathclyde Business Park, Bellshill (SM043), being changed from Business & Industrial to Green Belt.

Related to Mixed-Use

W H Sawyers (224) and supporting documents RD147-RD151 objects to CfS/MIR Site 0006/11 Site A and Site B north of M8 Junction 6 (SM023) being designated as Green Belt.

Taylor Grange Developments (170.287) and supporting documents RD008-RD017, objects to the wider site at Garrion Bridge (SM044) being designated as Green Belt.

Orchard Brae Ltd (278) objects to Land at Orchard Brae (SM013), being designated as Green Belt.

Modifications sought by those submitting representations:

Related to Housing

Ogilvie Homes (188.235); (188.237); (188.238); (189) and (190) and Walker Group (Scotland) Ltd (192) seek the removal of the Green Belt designation from CfS/MIR Sites 0009/02 (SM031), 0007/02 (SM032), 0008/02 (SM033), 0010/02 (SM037) and 0006/02 (SM028 and SM029) around Westerwood, Cumbernauld, and 0012/19 Knownoblehill, Cleland (SM034), and their re-designation as part of the General Urban Area.

Walker Group (Scotland) Ltd (192) and Homes for Scotland (266) object to the drawing of the Green Belt boundary without a proper assessment of the areas proposed to be designated as Green Belt and the reference to the Green Belt in policy is unclear. Walker Group (Scotland) Ltd (192) also objects to CfS/MIR Site 0010/02 North Muirfield Farm, Westerwood, Cumbernauld (SM037), being designated as Green Belt.

Manus O'Donnell (202) seeks clear guidance on legitimate change with regard to evolving Green Belt boundaries and the addition of wording to Policy PP 4 to accommodate Green Belt release when demonstrated to be required to facilitate development under associated policy criteria.

Whilst Homes for Scotland (266) seeks the deletion of Policy PP 4 Guidance, Barrett Homes West Scotland (231.305), Barrett Homes West Scotland & CALA Homes (West) Ltd (264) and SNH (272) seek the following additional text added to PP4 Policy and Guidance:

The second paragraph in Policy PP 4 should be amended as set out in the following paragraph:

> *North Lanarkshire Council will support developments for agriculture, forestry, recreation, or developments that need a non-urban location, including, where appropriate, Visitor Economy related development.* INSERT: [Where it is demonstrated that a five year effective housing land supply is not maintained at all times, additional land for housing development may be granted planning permission in the Green Belt and Countryside.]

The following should be inserted after paragraph 3 in the *PP 4 Purpose of Place Policy Guidance:*

> INSERT: [Where it is demonstrated that a five year effective housing land supply is not maintained at all times, additional land for housing development may be granted planning permission in the Green Belt and Countryside]

The following should be inserted after the bullet points in paragraph 4 in the *PP 4 Purpose of Place Policy Guidance:*

> INSERT: [Where it is demonstrated that a five year effective housing land supply is not maintained at all times by housing sub market area and / or local authority area, then the presumption in favour of development that contributes to sustainable development will be a significant material consideration. In such instances, proposals for housing development will only be required to demonstrate their compatibility with the Green Belt and their contribution towards sustainable development in the accompanying assessment of appropriateness.]

SNH (272) PP 4 Guidance page 73 second paragraph third line should be amended from "…, or needs a Green Belt location,…" to "…or is compatible with a Green Belt location,…".

Hallam Land Management (209) seeks the removal of land incorporating one of the courses at Dullatur Golf Club (SM007) from the Green Belt and its inclusion within the General Urban Area of Cumbernauld.

WB Properties Ltd (212.401) and supporting documents RD086-RD094 seeks the removal of land on Wishaw Low Road, Cleland (SM009 and SM010), south of Glen Noble, from the Green Belt.

Chepstow (Holdings) Ltd (214.272); (214.315); (214.316) and (214.318) seek the removal of CfS/MIR Site 0002/15 Kirklees Road, Mossend (SM035), and land incorporating CfS/MIR Sites 0022/05, 0023/05 and 0024/05 Glaudhall Farm, Mount Ellen (SM036), 0022/05, 0023/05 and 0024/05 Holms Farm/Glaudhall Farm, Mount Ellen, from the Green belt and their allocation as Proposed Housing Development Sites.

Stewart Milne Homes (216.274) and (216.313), seek the demarcation of the Green Belt/Proposed Housing Development Site 03/08 boundary to be formed by the North Burn, Mosside Farm, Airdrie (SM066), and the removal of CfS/MIR Site 0020/05 Burnbrae Road, Auchinloch (SM039), from the Green Belt and its allocation as a proposed Housing Development Site.

Taylor Wimpey Strategic Land (218), Taylor Wimpey (225.283); (225.300) and (225.306), seek the removal of CfS/MIR Sites 0003/13 Newlands Farm, Uddingston (SM040), 0006/19 Branchal Road, Cambusnethan (SM019), 0011/05 & 0012/05 Whitehill Farm, Stepps (SM020), and 0015/07 Glenmavis Road/Meldrum Mains, Glenmavis (SM021), from the Green Belt.

Uplands Developments Ltd (226) seeks the removal of CfS/MIR Site 0007/15 Cumbernauld Road/Woodhead Road, Muirhead (SM030), from the Green Belt.

Kapital Residential Ltd (234) seeks the removal of land at Chapelton, Sites 1 and 2, Condorrat (SM014 and SM015), from the Green Belt.

Robertson Homes (238) seeks the removal of CfS/MIR Site 0017/05 Broomknowes Farm, Auchinloch (SM069), from the Green Belt.

T Gorman Haulage Ltd (239) seeks the removal of CfS/MIR Site 0017/07 Theodore Fields, Burnhead Road, Airdrie (SM038), from the Green Belt.

Miller Homes (258) seeks the removal of CfS/MIR Site 0002/05 Craigendmuir, Dorlin Road, Stepps (SM041), from the Green Belt.

Ravenscraig Ltd (283) seeks the removal of land to the north of Chapelknowe Road, Carfin (SM008), from the Green Belt.

Woodend Farm (292) seeks the removal of land surrounding Woodend Farm, Kilsyth (SM042), (incorporating CfS/MIR Site 0007/01) from its Green Belt designation.

<u>Related to Business & Industry</u>

Newhouse Investments Ltd (187) and Arrandale Ltd (204) seek the removal of land south of Edinburgh Road, Newhouse, and land incorporating CfS/MIR Site 0001/12 Newhouse (SM001 and SM026), from the Green Belt and its re-designation for a mix of uses.

Trustees of Miss I D Meiklam (262) seeks the removal of the derelict Orchard Farm (SM011) steading site lying between the A8, M8 and rail line at Euro Central from the Green Belt and its re-designation under Policy PROM LOC 2.

Joeswood Estates Ltd (285.388) and (285.389) seek the removal of parts of Joeswood Estate, Gartloch Road, Gartcosh (SM005 and SM012), from the as Green Belt.

William Grant & Sons (291.400) seeks the removal of a site west of 4 Phoenix Crescent, Strathclyde Business Park, Bellshill (SM043), from the Green Belt and its inclusion in the Strategic Business Centre under Policy PP 2A.

Related to Mixed-Uses

Taylor Grange Developments (170.287) seeks the removal of the Green Belt designation at Garrion Bridge (SM044).

W H Sawyers (224) seeks the removal of CfS/MIR Site 0006/11 Site A and Site B north of M8 Junction 6 (SM023), from the Green Belt and their allocation as a Mixed Use Centre.

Orchard Brae Ltd (278) seeks to have Land at Orchard Brae (SM013), considered for inclusion within the General Urban Area as part of the Urban Review.

Summary of response by planning authority:

Related to Housing

Ogilvie Homes (188.235); (188.237); (188.238) and (189), Walker Group (Scotland) Ltd (192) and Manus O'Donnell (202) - Urban Boundaries Review Background Report (AD27) details how the Council carried out a boundary review to identify long-term, robust, sustainable Green Belt boundaries that are sensitive to the landscape character and setting of settlements. Westerwood is a designed neighbourhood, reflective of the original Cumbernauld New Town Plan, and the Green Belt boundary is sensitive to those original design principles. As part of the Local Development Plan's preparation, the Review is in line with Scottish Planning Policy (AD60) and Clydeplan Strategic Development Plan (AD59). The Policy and Guidance provide the current context for assessing developments in the Green Belt. The Council does not accept that further changes are needed in respect of these objections.

Barratt Homes West Scotland (231.305) Barratt Homes West Scotland & CALA Homes (West) Ltd (264) RD234 Homes for Scotland (266) and SNH (272) - The Guidance for Policy PP 4 gives more detail on the criteria for assessing developments in the Green Belt, and reflects the Policy that sets out the Council's position regarding development in the Green Belt. The Council does not accept that PP 4 Guidance should be deleted. The Policy and Guidance provides the current context for assessing developments in the Green Belt and supports the Vision and Spatial Strategy of the Plan. The Council does not accept that further amendments to the text of Policy and Guidance are needed in respect of these objections. Indeed, the Council feels that the amendment suggested by SNH (272) would be a dilution of the Protection afforded by the Policy.

Chepstow (Holdings) Ltd (214.272) Kirklees Road, Mossend; (214.315), (214.316) and (214.318) Holms Farm/Glaudhall Farm, Mount Ellen, and south by A752; Stewart Milne Homes (216.274) North Burn Mosside Farm Airdrie and (211.313) north of Burnbrae Road Auchinloch, Taylor Wimpey Strategic Land (218) Newlands Farm Tannochside, Taylor Wimpey (225.283) Branchal Road, Cambusnethan;(225.300) Whitehall Farm Stepps, and (225.306) Glenmavis Road/Meldrum Mains Glenmavis, Uplands Developments Ltd (226) Cumbernauld Road/Woodhead Road Muirhead, Taylor Grange

Developments (170.287) Garrion Bridge, Kapital Residential Ltd (234) land at South Myvot, Condorrat, Robertson Homes (238) Land East of Stepps Road, Auchinloch, T Gorman Haulage Ltd (239) Theodore Fields, Airdrie, Miller Homes (258) Dorlin Road, Stepps, Hallam Land Management (209) Dullatur Golf Course, Ogilvie Homes (190) Knownoblehill Cleland, Ravenscraig Ltd (283) land north of Chapelknowe Road, Carfin, WB Properties Ltd (212.401) land south of Glen Noble, and Woodend Farm (292) Woodend Farm Kilsyth.

The matter of the adequacy of the Housing Land Supply against the Housing Supply Target is dealt with under Issue 04 Policy PROM LOC 3 Housing Development Sites. The Council believes that is no justification for additional Green Belt release for urban uses. However, Urban Boundaries Review Background Report (AD27) opened the opportunity to implement small-scale amendments to the urban boundaries at individual settlement level to endorse Scottish Planning Policy (AD60) objectives in relation to Green Belt. Policy PROM LOC 3 and Guidance provide a sequential approach to selecting additional sites for housing, should the Housing Land Supply fall into shortfall at any time during the Plan's lifetime. The Council does not accept that further changes are needed in respect of these objections.

Related to Business & Industry

Newhouse Investments Ltd (187), Arrandale Ltd (204), Trustees of Miss I D Meiklam (262) Joeswood Estates Ltd (285.388) and (285.389) - The Council considers that the Green Belt designation supports the outcome of the Places for Business and Industry Charrette (AD30) that was undertaken to develop a policy framework reflective of that changing nature of the economy. The Council considers that there is no requirement to release Green Belt land for mixed uses, as there is sufficient Brownfield locations to meet demand. The Council does not accept that further changes are needed in respect of these objections.

William Grant & Sons (291.400) - If the Reporter is so minded, the Council would agree to the Plan being modified as requested, as it was a cartographic error that led to the land in question appearing in the Green Belt.

Related to Mixed-Use

W H Sawyers (225) Junction 6 M8, Orchard Brae Ltd (278) Calderbank/Airdrie - It should be noted that Planning Application 18/00890/PPP Residential-led and Mixed Use Development Masterplan is under consideration for Orchard Brae, and that the scale of both housing and commercial/business development proposed is not recognised as needed by Clydeplan Strategic Development Plan (AD59). As such, the Council considers that the existing Green Belt boundary reflects Scottish Government Planning Policy and Clydeplan. In relation to housing, the matter of the adequacy of the Housing Land Supply against the Housing Supply Target is dealt with under Issue 04 Policy PROM LOC 3 Housing Development Sites. The Council believes that there is no justification for additional Green Belt release for urban uses. However, Urban Boundaries Review Background Report (AD27) opened the opportunity to implement small-scale amendments to the urban boundaries at individual settlement level to endorse Scottish Planning Policy (AD60) objectives in relation to Green Belt. Policy PROM LOC3 and Guidance provides a sequential approach to selecting additional sites for housing, should the Housing Land Supply fall into shortfall at any time during the Plan's lifetime.

The Council does not accept that further changes are needed in respect of these objections. In relation to business and industry, the Council considers that the Green Belt designation supports the outcome of the Places for Business and Industry Charrette (AD30) that was undertaken to develop a policy framework reflective of that changing nature of the economy. The Council considers that there is no requirement to release Green Belt land for mixed uses, as there is sufficient Brownfield locations to meet demand and development of Ravenscraig, some 6km to the south remains both a national and Council priority. The Council does not accept that further changes are needed in respect of these objections.

Reporter's conclusions:

Westerwood Golf Club, Cumbernauld

1. Representation 188-235 (Settlement boundary at Westerwood Golf Club, Cumbernauld) is addressed in issue 16: General Urban Area.

Sites A and B, Dunning Drive and St Andrew's Drive, Cumbernauld

2. Representations 188-237 and 188-238 (Sites A and B, Dunning Drive and St Andrew's Drive, Cumbernauld) are addressed in issue 16.

Guidance in policy PP3

3. Representation 189 (whether guidance should be included in policy PP3) is addressed in issue 16.

Sites a and b, King's Drive, Westerwood, Cumbernauld

4. Representation 189 (sites a and b, King's Drive, Westerwood, Cumbernauld) is addressed in issue 8 Natural Environment and Green Network Assets.

Site at Knownoblehill, Cleland

5. Representation 190, which relates to the site at Knownoblehill, Cleland, is also recorded in issues 4 and 18. My conclusions here take into account the whole of the representation.

6. Among other things, representation 190 is accompanied by a single-page document (RD043) called "MIR Site assessment – Knownoblehill". The provenance of this document has been established by the council's reply to an informal request for further information (informal FIR 006).

7. Representation 190 says that the site at Knownoblehill should be removed from the green belt and allocated for housing development. The site has an area of 35 hectares and could accommodate approximately 350 dwellings, along with landscaping, tree planting, open space and community facilities.

8. The representation includes the following points. The proposed plan fails to identify an adequate housing land supply. Allocation of the Knownoblehill site for housing would help ensure constant maintenance of a five years' supply of effective housing land. The proposed development would enhance the setting of Cleland. The Tillan Burn, the

railway line and boundary tree planting would provide robust and defensible boundaries. The site is close to the village centre, the train station, bus services and schools. It has good accessibility to the A73 and M8. There are no known constraints that would prevent development. The site would be effective. Development would support the existing community through investment and regeneration. Local community facilities are in poor condition and the representor is willing to assist with the provision of improved community facilities.

9. With regard to housing land supply, in issue 4, we conclude that the modified proposed plan identifies housing sites in the Motherwell housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Motherwell housing sub-market area to ensure the plan is sufficient in regard to its provision of housing land.

10. With regard to the green belt, the proposed development would have an impact on views from the west and northwest. The site is part of an area that provides some relief between Cleland, Knownoble and the more extensive urban areas to the west and northwest. It therefore makes a positive contribution to the green belt's function in this area. I am satisfied that the site's green belt designation is appropriate in these circumstances, and in the context that there is currently no imperative to identify additional housing land in this area.

11. Submissions include reference to other matters, for example access, traffic generation, prior development of other sites in Cleland and community benefit. These matters are separate from whether the site should or should not be within the green belt.

12. My conclusion is that the site should remain in the green belt.

<u>No proper assessment of areas proposed for inclusion in the green belt</u>

13. Representation 192 objects to the way in which areas have been assessed for inclusion in the green belt.

14. The representation makes the following points. The council has not undertaken a proper green belt assessment. Scottish Planning Policy (paragraph 49) says that for most settlements, a green belt is not necessary. Other policies can provide an appropriate basis for directing development to the right locations. Paragraph 50 says in developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt. This has not been done. The representation seeks removal of the green belt designation around Westerwood "as being unjustified and unnecessary".

15. I note that the representation does not seek a general review of the extent of the green belt. What it seeks is confined to the representor's North Muirhead Farm site. This is addressed later, under the heading Site at North Muirhead Farm.

<u>Restrictive and complicated policy guidance</u>

16. Representation 266 expresses concern that the tightly-drawn boundaries of the green belt are not adequately justified. It goes on to say that the criteria in PP4 Purpose

of Place Policy Guidance are unnecessarily onerous. They set out a sequential approach which is not supported in policy. They go beyond paragraph 8.15 and policy 14 of Clydeplan. The Guidance would add further restrictions and complications for applicants. It should be deleted.

17. I note the criteria in PP 4 Purpose of Place Policy Guidance are expressed negatively, in that the guidance says:

> "…North Lanarkshire Council will encourage development appropriate for a Green Belt location by resisting development that is not for agriculture, forestry, recreation, tourism, or needs a Green Belt location …".

This indicates that anyone proposing development in the green belt should demonstrate that the development is for agriculture, forestry, recreation, tourism, or for some other purpose that needs a green belt location. Otherwise, the proposed development would not be viewed favourably. I find that these criteria bear similarities to the four types of acceptable development that are found in the green belt policy of the current, adopted local plan. They are typical of the kind of criteria that are found in other authorities' development plans.

18. In Clydeplan, paragraph 8.15 says that the green belt is an important strategic tool which has a significant role to play in supporting the delivery of the spatial development strategy and in achieving strategic objectives. These objectives include directing planned growth to the most appropriate locations, supporting regeneration, safeguarding identity and protecting landscape setting. I find that the PP 4 criteria accord with paragraph 8.15 of Clydeplan.

19. Regarding the sequential approach mentioned in the representation, I note that the second bullet point in the PP 4 Guidance refers to the town centres first sequential approach. The bullet point is one of six that describe matters that should be included in an assessment of appropriateness of any proposal for development. I find that this part of the guidance should assist an applicant for planning permission because it indicates matters that will be taken into account by the council when it determines the application.

20. My conclusion is that the PP4 Purpose of Place Policy Guidance should not be deleted. It should also be noted that in issue 1, we have recommended that all related 'policy' and 'guidance' sections be amalgamated.

<u>Site at North Muirhead Farm, Westerwood, Cumbernauld</u>

21. Representation 192 regarding the site at North Muirhead Farm, Westerwood, Cumbernauld is also recorded in issues 4, 18 and 29. My conclusions here take into account the whole of the representation.

22. On 22 October 2020, an informal request for further information was sent to the council. The council replied on 26 October 2020. This clarifies matters relating to the boundary of the site and the provenance of a document.

23. The representation includes the following points. The site at North Muirhead Farm should be removed from the green belt and identified as a potential housing site. This would be compatible with adjacent existing residential development. It would have a limited effect on the character of Westerwood. It would be as sustainable as any of the

nearby recently-constructed housing developments. It would be a logical rounding-off of residential development. In the current adopted local plan, the site is designated as Community Facilities. This designation also covers Muirhead Farm House where planning permission has been granted for two new dwellings. The green belt boundary has been drawn without proper assessment and without regard to paragraphs 49 and 50 of Scottish Planning Policy. The green belt designation around Westerwood is unjustified and unnecessary. It should be removed.

24. With regard to housing land supply, in issue 4, we conclude that the modified proposed plan identifies housing sites in the Cumbernauld housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Cumbernauld housing sub-market area to ensure the plan is sufficient in regard to its provision of housing land.

25. Regarding the green belt, from site inspection, I find that the site contributes to the attractive setting of this part of the Westerwood built-up area. For persons travelling north-west on the road to Dullatur, there is an attractive open view to the north. This would be constricted if the site were to be developed. In the vicinity of the site, the gap between Westerwood and Dullatur is already quite narrow. Development on the site would further reduce the gap, resulting in a perception of coalescence. I find that the representation site makes a positive contribution to green belt objectives.

26. With the foregoing considerations in mind and in the context that there is currently no imperative to identify additional housing land in this area, I am satisfied that the site's green belt designation is appropriate. My conclusion is that the proposed plan need not be altered.

<u>Allowing housing development if required in terms of housing land supply</u>

27. I note that representations include assertions that the proposed housing land supply is not adequate and that a five-year effective housing land supply will not be maintained at all times. Housing land supply is addressed in issue 4 Housing Development Sites.

28. Whatever the overall position regarding housing land supply, I acknowledge that it is possible, for whatever reason, that the effective housing land supply might fall below the minimum requirement at some stage during the currency of the proposed plan. In this circumstance, it might be necessary to consider whether new housing development should be permitted on land that is within the green belt.

29. It is my view that the concerns expressed in the representations are valid. In issue 4, we have recommended a modification to policy PROM LOC3 'Housing Development Sites', to include criteria which would apply in the event of there being less than a five-year effective housing land supply. One of the criteria to be added to that policy, and which would be expected to be satisfied by any proposals coming forward on green belt sites in these circumstances, is that "the development will not undermine Green Belt objectives".

30. I do not find any need to reiterate this policy approach (as modified) in policy PP 4, which appropriately focuses on outlining the scope for development in the green belt in normal circumstances. The modified policy PROM LOC3 as set out in issue 4 is sufficient

to indicate that where less than a five-year effective housing land supply is demonstrated, there is not a presumption against green belt sites in principle, thereby allowing for the suitability of green belt sites to be considered.

Scope for development in the green belt

31. Representation 272 says the second paragraph in PP 4 Purpose of Place Policy Guidance is too general or open-ended. It is suggested that "or needs a Green Belt location" should be amended to, for example, "or is compatible with a Green Belt location". In the council's view, this would be a dilution of the protection afforded by the policy.

32. I find that the unqualified use of "needs" could permit development that has a significantly adverse effect on the purposes of the green belt. I find that need for a green belt location should not be overriding but should be balanced against any impact on the purposes of the green belt. The text of the guidance should be amended.

Sites at Wishaw Low Road, Cleland

33. Representation 212-401 is addressed in issue 4: Housing Development Sites.

Site at Kirklee Road, Mossend

34. Representation 214-272, which relates to the site at Kirklee Road, Mossend, is also recorded in issue 4. My conclusions here take into account the whole of the representation.

35. The representation site extends from the rear of houses on the south-eastern side of Milnwood Drive to some 200 metres beyond the point where Kirklee Road passes beneath the railway line. The representation seeks removal of the site from the green belt and residential development within the northernmost part of the site. In the southern part of the site, existing tree planting would be augmented to create a community woodland.

36. The representation includes the following points. The range and mix of proposed housing would enhance the community as a desirable and attractive place in which to live. Developer contributions would be made in respect of education infrastructure and these contributions would upgrade and improve the local school infrastructure. The proposal includes open space facilities and the community woodland. The increase in number of residents would support local services such as public transport, health services and local shops. The development would create a robust and defensible boundary for this area of Mossend. The development would be compatible with neighbouring uses. Significant structure planting would screen and provide a buffer to the existing industrial uses to the east. The proposals are compatible with neighbouring uses. In 2007 and 2009, the council had in mind housing development on the site. Flood risk and undermining would not be constraints to development. Vehicular traffic could use Kirklee Road to its junction with Clydesdale Road or Douglas Drive. The site would be effective.

37. With regard to housing land supply, in issue 4, we conclude that the modified proposed plan identifies housing sites in the Motherwell housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of circular 6/2013: Development Planning makes clear that the scope of this examination

is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Morherwell housing sub-market area to ensure the plan is sufficient in regard to its provision of housing land.

38. I note that the part of the site on which residential development is proposed has, to a large extent, existing development on three sides – housing to the west and to the north sides and industrial on much of the east side. Even so, I find that the site does provide an attractive setting for the adjacent part of Mossend. I am satisfied that the site's green belt designation is appropriate in these circumstances, and in the context that there is currently no imperative to identify additional housing land in this area.

39. Submissions include reference to other matters, for example community enhancement, community woodland and access arrangements. These matters are separate from whether the site should or should not be within the green belt.

40. My conclusion is that the proposed plan need not be altered.

Site south of Glaudhall Farm, Mount Ellen

41. Representation 214-315 is also included in issue 4 Housing Development Sites. My conclusions here take into account the whole of the representation.

42. The representation refers to a site south of Glaudhall Farm. It seeks removal of the proposed green belt designation and designation as a housing development site. The site occupies ground between the farm buildings and Drumcavel Road. The east part of the site also extends up to the ridge to the east of the farm buildings.

43. With regard to housing land supply, in issue 4, we conclude that the modified proposed plan identifies housing sites in the Cumbernauld housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Cumbernauld housing sub-market area to ensure the plan is sufficient in regard to its provision of housing land.

44. In the proposed plan, the site is a part of the green belt that separates Mount Ellen from Chryston and Moodiesburn. The plan envisages a southward extension of Moodiesburn (site NLSK1102). This extension would bring the Moodiesburn settlement boundary to within some 200 metres of the settlement boundary at Mount Ellen and some 300 metres of the east boundary of the representation site.

45. The proposed plan identifies a series of sites for development: on land to the south of Mount Ellen; on land adjoining Gartcosh; and on land around Marnoch. There would thus be continuous development from Mount Ellen to Marnoch and beyond to Glenboig.

46. I find that the representation site is part of a relatively narrow section of green belt that has the important function of maintaining separation between the Mount Ellen to Marnoch development area and the communities at Chryston and Moodiesburn.

47. Glaudhall Farm and its associated buildings have a hill-top position. Thanks to the relatively low roof height of most of the buildings and the presence of trees, the farm and its buildings are not unduly prominent features in the landscape. The hill provides

effective separation between Mount Ellen and Chryston.

48. On the north side of Mount Ellen, there are service roads (Holms Place, Coronation Place and Bothlyn Crescent) adjacent to Drumcavel Road. The adjoining houses face outwards, to the north. This arrangement forms an attractive and robust edge to the built-up area. The houses have a pleasant outlook. They benefit from the rural character of the land to the north.

49. I note what is said regarding landscape impact and the contention that a robust green belt boundary would be created. I find that the proposed development would encroach into a particularly narrow section of green belt that has the important function of maintaining separation between Chryston and the expanded Moodiesburn and the expanded communities at Gartcosh and Marnoch. This function would be adversely affected by the proposed development. There would also be an adverse impact on the setting of the north side of Mount Ellen.

50. I do not find the "poorly defined edge to Muirhead to the west" to be supportive of the representation. Existing development on this side of Muirhead, as seen from the representation site, has a low-density appearance and is very much softened and screened by trees. The green belt boundary shown in the proposed plan would be satisfactory.

51. The representation makes reference to other matters, for example access, traffic and public transport. These matters are separate from whether the site should or should not be within the green belt.

52. With the foregoing considerations in mind and in the context that there is currently no imperative to identify additional housing land in this area, I am satisfied that the site's green belt designation is appropriate. My conclusion is that the proposed plan need not be altered.

Holms Farm masterplan site

53. Representation 214-316 is also included in issue 4 Housing Development Sites. My conclusions here take into account the whole of the representation.

54. The Holms Farm site takes in the site south of Glaudhall Farm. It extends eastwards to the west edge of site NLSK1102. It extends northwards to the Bothlin Burn and north-westwards to the A80 at Chryston. The representation requests that the site be removed from the green belt and identified as a residential-led development opportunity site to be subject to an appropriate masterplanning exercise. The following elements should be contained within the masterplan: residential areas, affordable housing, road linking A752 to A80, site for provision of a new joint school campus, open space, landscape framework, footways and cycleways.

55. With regard to housing land supply, in issue 4, we conclude that the modified proposed plan identifies housing sites in the Cumbernauld housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Cumbernauld housing sub-market area to ensure the plan is sufficient in regard to its provision of housing land.

56. In the proposed plan, the site is a part of the green belt that separates Mount Ellen from Chryston and Moodiesburn. The plan envisages a southward extension of Moodiesburn (site NLSK1102). This extension would bring the Moodiesburn settlement boundary to within some 200 metres of the settlement boundary at Mount Ellen.

57. The proposed plan identifies a series of sites for development: on land to the south of Mount Ellen; on land adjoining Gartcosh; and on land around Marnoch. There would thus be continuous development from Mount Ellen to Marnoch and beyond to Glenboig.

58. I find that the representation site is part of a relatively narrow section of green belt that has the important function of maintaining separation between the Mount Ellen to Marnoch development area and the communities at Chryston and Moodiesburn. Development of the representation site would mean that there would no longer be any land of rural character between Mount Ellen, Chryston and Moodiesburn. I find that this would have an unacceptably adverse effect on the setting and individual identities of these three communities.

59. It is contended that the proposed development would create a robust and defensible green belt boundary: the boundary to the north would utilise the A80 and the Bothlin Burn while the proposed new road and extensive tree belt would form a strong, long-term eastern boundary. To the south the A752 would form the boundary while to the west Glaudhall Farm, its existing access road and the rear gardens of properties in Muirhead would form the boundary.

60. I note that, in the proposed plan, the A80 is shown as being in the green belt. Land immediately to the north is part of the settlement area of Chryston and is not green belt. Thus, rather than there being a robust and defensible green belt boundary along the A80, there would, in practical terms, be no green belt on this side of the site. A similar comment may be made regarding the southern boundary where it adjoins Drumcavel Road with Mount Ellen beyond. The eastern boundary would adjoin site NLSK1102. This site is not part of the green belt, so there would be no green belt on the east side of the site.

61. With further regard to robust and defensible green belt boundaries, I find that the green belt boundaries on the A80 side of Chryston and on the A752 side of Mount Ellen are robust. They are clearly-defined by significant features. They protect land that provides an attractive setting for the respective communities. The proposed development would eliminate these parts of the settings and would remove the amenity that they provide.

62. The representation makes reference to other matters, for example access, traffic, community benefit and economic benefit. These matters are separate from whether the site should or should not be in the green belt.

63. With the foregoing considerations in mind and in the context that there is currently no imperative to identify additional housing land in this area, I am satisfied that the site's green belt designation is appropriate. My conclusion is that the proposed plan need not be altered.

<u>Site north of Glaudhall Farm, Muirhead</u>

64. Representation 214-318 is also included in issue 4 Housing Development Sites. My

conclusions here take into account the whole of the representation.

65. The representation site is part of the Holms Farm masterplan site. It extends north from Glaudhall Farm down to the A80 road and west to the rear of properties on the east side of Station Road in Muirhead. The representation seeks removal of the green belt designation and designation of the site for residential development. The representation says that the proposed development would create a robust and defensible boundary for the settlement of Muirhead.

66. With regard to housing land supply, in issue 4, we conclude that the modified proposed plan identifies housing sites in the Cumbernauld housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Cumbernauld housing sub-market area to ensure the plan is sufficient in regard to its provision of housing land.

67. In the proposed plan, the site is a part of the green belt that separates Muirhead and Mount Ellen from Chryston. The green belt boundary on the south side of Chryston is defined by the northern side of the A80 dual carriageway. I find that the A80 is a strong feature in the landscape. The green belt boundary is robust.

68. The representation site can be seen from parts of Chryston. I find that the site, with its rising ground and rural character, provides an attractive setting and backdrop for Chryston. The site is the northern half of an area of land that provides very effective separation between Chryston and Mount Ellen.

69. The considerations in the two previous paragraphs lead me to disagree with the claim that what is proposed in the representation would amount to a rationalisation of the green belt boundary. I find that the representation site is an important and effective part of the green belt.

70. The representation makes reference to other matters, for example access, traffic, public transport, community benefit and economic benefit. These matters are separate from whether the site should or should not be in the green belt.

71. With the foregoing considerations in mind and in the context that there is currently no imperative to identify additional housing land in this area, I am satisfied that the site's green belt designation is appropriate. My conclusion is that the proposed plan need not be altered.

<u>Site at Mosside Farm, Airdrie</u>

72. Representation 216-274 is addressed in issue 4 Housing Development Sites.

<u>Site at Burnbrae Road, Auchinloch</u>

73. The basis of representation 216-313 is addressed in issue 4: Housing Development Sites. There we have found that with the exception of the Airdrie and Coatbridge housing sub-market area, the proposed plan has identified sufficient land to meet the housing land requirements set by Clydeplan. This site is within the Cumbernauld housing sub-market area. Therefore, we have not given further consideration to its potential suitability for

housing, as its requested allocation would not address an insufficiency in the proposed plan.

Newlands Farm

74. The basis of representation 218 is addressed in issue 4: Housing Development Sites. There we have found that with the exception of the Airdrie and Coatbridge housing sub-market area, the proposed plan has identified sufficient land to meet the housing land requirements set by Clydeplan. This site is within the Motherwell housing sub-market area. Therefore, we have not given further consideration to its potential suitability for housing, as its requested allocation would not address an insufficiency in the proposed plan.

Site at Branchal Road, Cambusnethan

75. Representation 225-283 regarding the site at Branchal Road, Cambusnethan is also recorded in issues 1, 4, 28 and 32. My conclusions here take into account the whole of the representation.

76. The main points in the representation may be summarised briefly as follows. The proposed plan does not identify enough land for housing development. The site at Branchal Road, Cambusnethan should be removed from the green belt and be allocated for residential development for approximately 300 houses. The council's consultation process was too restricted. Sites favoured for development may well prove to be ineffective. The site at Branchal Road is effective and deliverable. Its development would help to support and sustain existing community services such as the primary school and bus services. The site is extremely well-contained with robust and defensible green belt edges that are better than those that currently exist in the form of garden fences along the rear of properties on Barra Avenue and Lewis Avenue.

77. With regard to housing land supply, in issue 4, we conclude that the modified proposed plan identifies housing sites in the Motherwell housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Motherwell housing sub-market area to ensure the plan is sufficient in regard to its provision of housing land.

78. With regard to green belt, from my inspection I note that the boundary along the rear of properties in Barra Avenue and Lewis Avenue marks a clear-cut division between urban and rural land use. The pleasant, if unremarkable, appearance of the representation site makes a positive contribution to the setting of the built-up area. During my inspection, I noted that the site is used by persons out for a walk. I conclude that the site makes a positive contribution to the green belt.

79. With the foregoing considerations in mind and in the context that there is currently no imperative to identify additional housing land in this area, I am satisfied that the site's green belt designation is appropriate. My conclusion is that the proposed plan need not be altered.

Site at Whitehill Farm, Stepps

80. Representation 225-300 regarding the site at Whitehill Farm, Stepps is also recorded in issues 1, 4, 28 and 31. My conclusions here take into account the whole of the representation.

81. A request for further information was issued on 8 December 2020. It sought clarifications regarding the boundary of the site at Whitehill Farm. The council replied on 18 December 2020. The representor replied on 8 January 2021. I have noted the content of the replies.

82. The representation seeks removal of the representation site's green belt designation. The site should be allocated for a residential development of approximately 400 houses.

83. With regard to housing land supply, in issue 4, we conclude that the modified proposed plan identifies housing sites in the Cumbernauld housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Cumbernauld housing sub-market area to ensure the plan is sufficient in regard to its provision of housing land.

84. The south boundary of the representation site adjoins the Cumbernauld to Glasgow railway line. The south-east boundary adjoins the edge of the built-up area along Whitehill Farm Road and Bothlin Drive. The site extends across Lenzie Road to take in a parcel of land on the east side of that road. The north-west boundary of the site follows the line of the Garnkirk Burn. Map SM020 in the council's site map booklet shows a slightly smaller site.

85. In the current, adopted local plan and in the proposed plan, the site is designated as part of the green belt.

86. The representation says that development on the representation site could form a natural settlement expansion and infill between the existing settlement edge and the Garnkirk Burn. Land beyond would act as a new settlement edge and buffer to the M80. The existing settlement edge adjacent to the land at Whitehill Farm is poorly defined and does not form a robust and defensible long-term edge to the green belt. The site is in a low-lying position below the M80. It is not highly visible. It could accommodate development without significant adverse landscape impact.

87. The representation goes on to say that vehicular access could be taken from Lenzie Road and Whitehill Farm Road. Pedestrian connections should be possible from multiple points. A successful planning appeal at Hornshill Farm, which sits to the east and in similar relationship between the existing settlement and the M80, establishes a clear precedent for development being accepted between the M80 and the existing settlement edge of Stepps. The representation site is identified as being potentially affected by surface water flooding on the Scottish Environment Protection Agency's Flood Map. This only impacts small parts of the site and could be allowed for in the site layout. If allocated for development, the site would be effective.

88. I find that reference to infill between the existing settlement edge and the Garnkirk

Burn suggests that the Garnkirk Burn is a defining feature in the landscape. From my site inspection, I note that hereabouts the Garnkirk Burn is flowing across ground that is relatively flat. The burn is inconspicuous in the landscape. I find that the north-west boundary of the site is not defined by a clearly identifiable visual boundary marker based on landscape features such as rivers, tree belts, railways or main roads (Scottish Planning Policy, paragraph 51).

89. From my inspection, I note that the existing green belt boundary on the south-east side of the site is clearly defined by the built-up area on one side and by undeveloped ground on the other side. This clarity is not diminished by the mixture of building forms. The presence of hedging and trees is a positive feature. I find that the existing green belt boundary is satisfactory.

90. I accept that the low-lying nature of the main part of the site adjacent to Whitehill Farm means that development here is not likely to have significant adverse landscape impact, but the fact remains that much of the new green belt boundary envisaged in the representation would lack definition in the landscape.

91. The representation makes reference to other matters, including access and an appeal decision relating to a site at Hornshill Farm. These matters are separate from whether the site should or should not be within the green belt.

92. With the foregoing considerations in mind and in the context that there is currently no imperative to identify additional housing land in this area, I am satisfied that the site's green belt designation is appropriate. My conclusion is that the proposed plan need not be altered.

Site at Glenmavis Road and Meldrum Mains, Glenmavis

93. Representation 225-306 is addressed in issue 4 Housing Development Sites.

Site at Cumbernauld Road/Woodhead Road, Muirhead

94. Representation 226 seeks removal of the green belt designation of a site at Muirhead. The site should be allocated for a retirement village comprising care home, care village and retirement housing. The representation contends that there is an established need for private sector specialist housing provision of this kind.

95. With regard to housing land supply, in issue 4, we conclude that the modified proposed plan identifies housing sites in the Cumbernauld housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Cumbernauld housing sub-market area to ensure the plan is sufficient in regard to its provision of housing land.

96. In relation to the green belt, I find that the site is an important part of the open ground that separates Muirhead from Stepps. Even if built development were confined to the eastern half of the site, there would be a significant reduction in the relatively narrow gap (particularly as experienced by A80 travellers) between the two communities.

97. The representation makes reference to other matters, for example accessibility and

need for specialist housing provision for elderly residents in the Moodiesburn area. These matters are separate from whether the site should or should not be in the green belt.

98. With the foregoing considerations in mind and in the context that there is currently no imperative to identify additional housing land in this area, I am satisfied that the site's green belt designation is appropriate. My conclusion is that the proposed plan need not be altered.

Land at South Myvot, Auchenkilns (Chapelton Road, Condorrat)

99. Representation 234 is also recorded in issues 4, 20 and 29. My conclusions here take into account the whole of the representation.

100. So far as I am aware, the representation sites are not included in the Main Issues Report, have not been the subject of public consultation and have not been subject to strategic environmental assessment. Paragraph 118 of circular 6/2013: Development Planning says:

> "Reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites."

101. In the circumstances, it would not be appropriate to recommend altering the proposed plan in response to the representation.

Land East of Stepps Road (South Broomknowes) Auchinloch

102. Representation 238 contends that a site east of Stepps Road and south of Burnbrae Road should excluded from the green belt and identified for residential development. The site covers 8.3 hectares and could accommodate 100 dwellings.

103. Points made in support of the representation include the following. The proposed plan does not contain an adequate supply of effective housing land. If identified for residential development, the site would be effective. Vehicular access to the site could be provided from Stepps Road via a new three-arm roundabout. Given the accident record of Stepps Road, the roundabout would provide traffic calming. All proposed dwellings would be within 400 metres of existing bus stops. Bus services provide a connection to Lenzie railway station. Auchinloch Primary school has capacity for increased pupil numbers, albeit not for significant growth. Millersneuk Primary School is nearby but outwith North Lanarkshire. Given recent allocations of land to the west of the B757 Stepps Road, the site is the next natural location for expansion of Auchinloch. The site has defensible boundaries in the form of road infrastructure and a natural basin. The latter acts as a pluvial catchment area and would restrict further development to the south. The A806 would provide a strong edge to Auchinloch. The site is subject to potential detrimental noise pollution from the A806. This could be mitigated by measures such as an appropriate set-back, planting buffers or acoustic fence. Views of the site are well-contained. The site is seen in the context of Auchinloch.

104. With regard to housing land supply, in issue 4, we conclude that the modified proposed plan identifies housing sites in the Cumbernauld housing sub-market area

sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Cumbernauld housing sub-market area to ensure the plan is sufficient in regard to its provision of housing land.

105. Regarding the green belt designation, from my inspection, I find that the appearance of the representation site is pleasantly rural. It makes an attractive contribution to the setting of Auchinloch. Very little of Auchinloch is visible from the A806. The site forms part of a pleasantly rural prospect glimpsed from the A806. It provides worthwhile separation between the A806 with its traffic noise and Auchinloch. The southern boundary of the site is not marked by any existing feature of landscape significance.

106. The representation makes reference to other matters, such as access, public transport, traffic noise and proximity of a primary school. These matters are separate from whether the site should or should not be in the green belt.

107. With the foregoing considerations in mind and in the context that there is currently no imperative to identify additional housing land in this area, I am satisfied that the site's green belt designation is appropriate. The proposed plan need not be altered.

Theodore Fields, Burnhead Road, Airdrie

108. Representation 239 regarding the site at Theodore Fields, Burnhead Road, Airdrie is addressed in issues 4 and 18.

Site at Craigendmuir, Dorlin Road, Stepps

109. Representation 258 is addressed in issue 31 Northern Corridor Local Area Partnership.

Dullatur Golf Course, Cumbernauld and Land North of Chapelknowe Road, Carfin

110. So far as I am aware, the sites to which representations 209 and 283 refer are not included in the Main Issues Report, have not been the subject of public consultation and have not been subject to strategic environmental assessment. Paragraph 118 of circular 6/2013: Development Planning says:

> "Reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites."

In the circumstances, it would not be appropriate to recommend altering the proposed plan in response to the two representations.

Land at Woodend Farm, Kilsyth

111. Representation 292 is also recorded in issue 29. My conclusions here take into account the whole of the representation.

112. The representation includes the following main points. The land surrounding Woodend Farm does not make a significant contribution to green belt objectives. Much of the immediate surroundings are urban in nature. The principle of development has been established by previous planning permissions. Removing the site from the green belt would have no adverse impact on the character or setting of Kilsyth. The western half of the site is an appropriate location for housing development, being bounded by existing and proposed residential developments to the north, south and west and being close to infrastructure services and facilities. The proposed plan fails to allocate sufficient land for housing development. In the eastern part of the site, permissions have been granted for an equestrian centre and a chalet and caravan park with walker and visitor centre development. These uses would be part of a wider tourism and leisure development aimed at maximising Kilsyth's potential as a 'visitor economy location'. The western part of the site should be allocated for housing development. The eastern part of the site should be a 'proposed regeneration site' with potential for the provision of tourism and recreation facilities. The green belt designation should be removed.

113. With regard to housing land supply, in issue 4, we conclude that the modified proposed plan identifies housing sites in the Cumbernauld housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Cumbernauld housing sub-market area to ensure the plan is sufficient in regard to its provision of housing land.

114. With regard to the green belt, during my inspection of the site, among the signs of relatively recent earthmoving, I noted the existence of a network of informal paths within the site and the presence of persons out walking. Pedestrian access to the site is available at a number of points along the public path that adjoins the northern boundary of the site.

115. I find that the site has a pleasantly open character. It provides an attractive rural aspect for users of the adjacent footpath.

116. The western part of the site is indeed surrounded by areas that are urban in nature, but, from my inspection, I note a marked difference in levels between the site and residential development to the south and west. The extent of nearby development is not apparent from the site and has a limited effect on the undeveloped character of the site.

117. I note that, in the eastern part of the site, permissions have been granted for development related to leisure activities. From my inspection, I find that this part of the representation site has a predominantly rural character and makes a positive contribution to the green belt. In the proposed plan, green belt policy does not prohibit all development in the green belt, and it may be that further leisure-related development might be approved if shown to be compatible with green belt purposes.

118. I find that the representation site as a whole makes a positive and worthwhile contribution to the purposes of the green belt.

119. With the foregoing considerations in mind and in the context that there is currently no imperative to identify additional housing land in this area, I am satisfied that the site's green belt designation is appropriate. The proposed plan need not be altered.

Land South of Edinburgh Road, Newhouse (Greenside Farm) (SM001)

120. Representation 204 (land south of Edinburgh Road, Newhouse (Greenside Farm)) is also recorded in issues 3, 4 and 18. My conclusions here take into account the whole of the representation.

121. I note from representation 204 that development on the northern part of the site south of New Edinburgh Road, Newhouse has been promoted previously. So far as I am aware, the somewhat larger site to which representation 204 refers is not included in the Main Issues Report, has not been the subject of public consultation and has not been subject to strategic environmental assessment. Paragraph 118 of circular 6/2013: Development Planning says:

> "Reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites."

122. In the circumstances, it would not be appropriate to recommend altering the proposed plan in response to the representation.

Land South of Edinburgh Road, Newhouse (SM026)

123. The site to which representation 187 refers is within the green belt in both the existing, adopted local plan and in the proposed local development plan. There is a large number of self-seeded, semi-mature trees in the northern part of the site. Rough grazing covers other parts of the site. The site is at a lower level than the B7066 which adjoins the north-west boundary. It is generally flat. Along a large part of the frontage to the B7066 are retaining walls and a disused railway tunnel.

124. The representation refers to the site as brownfield. This is strictly true, but colonisation of part of the site by trees and the green appearance of most of the rest of the site mean that it has little or no detriment to the general appearance of the locality.

125. On ground to the north-east, inconspicuous buildings contain a water authority pumping station. There are two cottages on the north side of the B7066. The surrounding area, from the B7066 in the north and from the A73 in the west is predominantly open countryside in use for grazing. The garden centre which can be seen on the west side of the A73 has minimal impact on this open character.

126. I find that development on the site would be seen as a largely isolated development in a countryside area. In landscape terms, it would have no connection with the industrial and commercial development that is on the north-west side of the A755 and that comes within about 200 metres of the site.

127. The representation refers to development as part of a wider allocation of adjoining and surrounding land. I can give no consideration to such a possibility as it involves land outwith the representation site and is entirely lacking in detail.

128. I note that the B7066 is a wide road with a straight alignment. It may be that access to the site could be provided to an acceptable standard, but this remains to be demonstrated by preparation of detailed drawings.

129. Regarding nearby bus stops, if use of these is to be encouraged, consideration would have to be given to provision of a means whereby pedestrians could cross the road safely.

130. I note that there may be shallow mine workings beneath the site, that there may be made ground within the site and that it should be possible to address any such features.

131. There is reference to planning permission for development on green belt land to the north of M8/A73 junction. Evidence does not demonstrate that this other development and its circumstances are so similar to the representation proposal as to constitute a persuasive precedent.

132. The representation refers to developing the site for employment. Evidence does not demonstrate that there is any shortage of land allocated for employment uses.

133. Regarding defensible boundaries for the green belt, apart from the north boundary which adjoins the B7066, I find that the site boundaries are very weakly defined on the ground. The nearest part of the green belt boundary in the proposed plan is robustly defined by sections of the A73, M8 and A775.

134. My conclusion is that the site should not be removed from the green belt. There is no need to alter the proposed plan.

Orchard Farm Steading site

135. Representation 262 says that the Orchard Farm Steading site should be removed from the green belt and included in the boundary of the land to which Policy PROM LOC2: Business Development Sites applies.

136. So far as I am aware, the site to which representation 262 refers is not included in the Main Issues Report, has not been the subject of public consultation and has not been subject to strategic environmental assessment. Paragraph 118 of circular 6/2013: Development Planning says:

> "Reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites."

137. The considerations in the preceding paragraph mean that it would not be appropriate to recommend altering the proposed plan in response to the representation.

Sites 1 and 2, Gartloch Road, Gartcosh

138. Representation 285 relates to two sites at Gartloch Road, Gartcosh. Site 1 is SM012 and site 2 is SM005 in the site map booklet. The representation is also recorded in issue 4: Housing Development Sites and issue 15: Visitor Economy Areas & Locations.

139. So far as I am aware, the sites to which representation 285 relates are not included in the Main Issues Report, have not been the subject of public consultation and have not been subject to strategic environmental assessment. Paragraph 118 of circular 6/2013: Development Planning says:

> "Reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites."

140. The considerations in the preceding paragraph mean that it would not be appropriate to recommend altering the proposed plan in response to the representation.

Strathclyde Business Park, Bellshill

141. In response to representation 291-400, the council says that the green belt designation in the proposed plan is a cartographic error. I see no reason why the representation site should be included in the green belt. The proposed plan should be modified as requested.

Sites A and B north of M8

142. Representation 224 is addressed in issue 3: Business Development Sites.

Garrion Bridge

143. Representation 170-287 relating to the site at Garrion Bridge is also recorded in issue 4 Housing Development Sites. The text that follows addresses the green belt aspect of the representation.

144. Representation 170-287 "objects to the zoning of the wider site at Garrion Bridge as green belt". The housing sites should be extended to include all of residential zones 2, 3 and 4 shown on the indicative masterplan that has been prepared. The masterplan also envisages "enhancement of the riverside area linking to the Clyde Walkway to include: woodland management plan, open space/landscaping/tree planting, biodiversity and ecological habitats, green network enhancements, recreational uses, nature conservation opportunities, community play areas/ nature walks/seating areas, additional footpaths, improved pedestrian and cycle ways, pedestrian footpaths, new public car park and land for improved road junction."

145. I note that Garrion Bridge is within the Clyde Valley and that the Clyde Valley hereabouts is designated as a special landscape area. During my site inspection, I was able to see for myself the attractive quality of the landscape. A predominant characteristic of the landscape, not surprisingly, is its rural nature. A central feature of the landscape is the River Clyde.

146. What the representation seeks would bring development closer to the River Clyde. I note the possibility of carrying out the kind of landscape planting shown on the Indicative Masterplan. I also note that riparian woodland has a screening effect. These considerations would not prevent development on the extension sites from having an adverse effect on the rural setting and landscape character of this locality within the special landscape area. Development on the extension sites would also reduce the area available for landscape planting that could help to screen the housing sites that are identified in the proposed plan. I find that what is sought in the representation would conflict with the green belt purposes of protecting natural assets and providing a high-quality environment.

147. My conclusion is that the green belt zoning shown in the proposed plan should be retained. There is no need to alter the plan.

Land at Orchard Brae

148. Representation 278 is also recorded in issues 4 and 26. My conclusions here take into account the whole of the representation. The representation seeks removal of the green belt designation. The site should be a proposed housing development site. The representation includes reference to an application for planning permission that is yet to be determined. In connection with the planning application a master plan and an environmental impact assessment have been prepared.

149. A request for further information was issued on 27 January 2021. The council's response on 10 February 2021 confirmed that representation 278 was not supported by other documentation and that there had been no earlier submission in relation to the specific site delineated in representation 278.

150. I find that the representation site is not included in the Main Issues Report, has not been the subject of public consultation in relation to the proposed local development plan and has not been subject to strategic environmental assessment in relation to the proposed local development plan. Paragraph 118 of circular 6/2013: Development Planning says:

> "Reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites."

151. The considerations in the preceding paragraph mean that it would not be appropriate to recommend altering the proposed plan in response to the representation.

Reporter's recommendations:

1. On page 73, in policy 4 Green Belt, PP 4 Purpose of Place Policy Guidance, add the following to the second paragraph:

> With regard to development that needs a green belt location, the need will be balanced against any adverse effects on the purposes of the green belt.

2. On pages 10.3 and 10.4 in the Modified Proposed Plan Map Book change the designation of site "SM043 Land to the west of William Grant and Sons at Strathclyde Business Park, Bellshill" from "Green Belt" to "Business Centre".

Issue 018	**Green Belt - Amount of Development**	
Development plan reference:	AD 4 Green Belt Amount of Development Policy and Guidance Page 74	**Reporter:** Robert Maslin
Body or person(s) submitting a representation raising the issue (including reference number):		
Newhouse Investments Ltd (187) Ogilvie Homes (188) Ogilvie Homes (190) Walker Group (Scotland) Ltd (192) Manus O'Donnell (202) Arrandale Ltd (204) J & P Hannaway (227) Barratt Homes West Scotland (231) T Gorman Haulage Ltd (239) Miller Homes (258) Sir Frank Mears Associates (261) Barratt Homes West Scotland & CALA Homes (West) Ltd (264) Homes for Scotland (266) Network Rail (274)		
Provision of the Development Plan to which the issue relates:	4 Green Belt Policy AD 4 Amount of Development Applications for planning permission for new development will be assessed for their implications related to the amount of development proposed. Policy AD 4 Guidance Applicants will be expected to provide the identified appraisals and assessments, which should be submitted with any planning application to allow consideration of the proposal. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		
Ogilvie Homes (188.235) and supporting documents RD025-RD033; Ogilvie Homes (188.237) and supporting documents RD034-040; Ogilvie Homes (188.238) and supporting documents RD041 & RD042, and Ogilvie Homes (190) and supporting documents RD043-RD045, object to CfS/MIR Sites 0009/02 Westerwood Golf Club, Cumbernauld (SM031), 0007/02 Site A Dunning Drive, Cumbernauld (SM032), 0008/02 Site B Dunning Drive, Cumbernauld (SM033), 0006/02 King's Drive, Cumbernauld (SM028 and SM029), Walker Group (Scotland) Ltd (192) North Muirfield Farm, Westerwood (SM037), Cumbernauld and 0012/19 Knownoblehill, Cleland (SM034), being designated as Green Belt. Walker Group (Scotland) Ltd (192) and Homes for Scotland (266) and supporting documents RD235-RD237, object to the drawing of the Green Belt boundary without a proper assessment of the areas proposed to be designated as Green Belt and the reference to the Green Belt in policy is unclear.		

Manus O'Donnell (202), Barratt Homes West Scotland (231.305) and supporting documents RD187-RD195, Miller Homes (258) and supporting document RD218-RD220 and Barratt Homes West Scotland & CALA Homes (West) Ltd (264.345) and supporting documents RD228-RD234 object to Policy 4 AD 4 on the grounds that it does not reflect Scottish Planning Policy (AD60), Clydeplan Strategic Development Plan (59) Policy 8, or LDP Policy PROM LOC 3 in outlining circumstances in which appropriate development would be considered acceptable in the Green Belt when a housing land shortfall has been identified. Homes for Scotland (266) and supporting documents RD235-RD237, objects to the fourth bullet point on the grounds that it is unnecessary and that the sequential approach set out at Policy PROM LOC 3 is inappropriate.

Arrandale Ltd (204) and supporting documents RD052-RD063, Newhouse Investments Ltd (187) and supporting documents RD256 &RD257,object to sites south of Edinburgh Road, Newhouse, and incorporating CfS/MIR Site 0001/12 Newhouse (SM001 and SM026), being designated as Green Belt.

J & P Hannaway (227) and supporting documents RD161-RD175, objects to the whole of CfS/MIR Site 0007/11 Sykeside Road, Airdrie, site not being allocated as Proposed Housing Development Site 07/11 (Map Book 9.4).

T Gorman Haulage Ltd (239) objects to CfS/MIR Site 0017/07 Theodore Fields, Burnhead Road, Airdrie (SM038) being designated in the Green Belt on the grounds that as it is not currently contributing positively to the Green Belt.

Sir Frank Mears Associates (261) objects to the expansion of the General Urban Area to the east of Cleland (SM003) to include only part of the land put forward and the stifling of opportunities for future development of the land holding, instead it should be extended to include the whole of the site.

Network Rail (274) and supporting documents RD238-RD240, objects to Policy AD 4 on the grounds that it does not give a clear indication as to whether it applies to the railway network, as it does not fit into any of the uses listed in the associated tables and guidance for *sui generis* has not been provided.

Modifications sought by those submitting representations:

Ogilvie Homes (188.235); (188.237); (188.238) and (190), and Walker Group (Scotland) Ltd (192) seek the removal of the Green Belt designation from CfS/MIR Sites 0009/02 Westerwood Golf Club, Cumbernauld (SM031), 0007/02 Site A Dunning Drive, Cumbernauld (SM032), 0008/02 Site B Dunning Drive, Cumbernauld (SM033), 0010/02 (SM037) and 0006/02 (SM028 and SM029) around Westerwood, Cumbernauld, and 0012/19 Knownoblehill, Cleland (SM034), and their re-designation as part of the General Urban Area. Walker Group (Scotland) Ltd (192) also objects to CfS/MIR Site 0010/02 North Muirfield Farm, Westerwood, Cumbernauld (SM037), being designated as Green Belt.

Manus O'Donnell (202), Barratt Homes West Scotland (231.305), Barratt Homes West Scotland & CALA Homes (West) Ltd (264.345) and Miller Homes (258) seek the following amendments to the text of Policy AD 4 and Guidance:

Manus O'Donnell (202) seeks the deletion from AD 4 Guidance of the 4th paragraph "Development not meeting these requirements will not be supported" and the addition of a

new sentence "In the event of a shortfall in effective housing land being identified, the Council will support development for housing in Green Belt where it can be demonstrated that the test of Policy PROM LOC 3 has been satisfied."

Barratt Homes West Scotland (231.305) and Barrett Homes West Scotland & CALA Homes (West) Ltd (264.345) seek the amendment of the second sentence of Policy AD 4 as follows:

The need for an assessment depends on the combination of type (Use Class), scale "*location of development and whether a five year effective housing land supply is maintained at all times.*"

And the insertion of the following paragraph after the first paragraph in *AD 4 Amount of Development Policy Guidance:*

"*Where it is demonstrated that a five year effective housing land supply is not maintained at all times, the Green Belt will be considered to have a purpose in providing additional land for housing development. In such a circumstance, the presumption in favour of development that contributes to sustainable development will be a significant material consideration. Proposals for housing development will therefore only be required to demonstrate their compatibility with the Green Belt, and contribution towards sustainable development, in the accompanying assessment of appropriateness.*"

Miller Homes (258) seeks that the wording under Use Class 9 of the Policy is amended to:

"To support Green Belt appropriate use and, if required, to mitigate deficits in the 5-year housing land supply (Policy PP 4)". Also that the 3rd and 4th bullet point in the 3rd paragraph of Guidance AD 4 are deleted.

Homes for Scotland (266) seeks the removal of Guidance AD 4 3rd paragraph, 4th bullet point.

Arrandale Ltd (204) and Newhouse Investments Ltd (187) seek the removal of land south of Edinburgh Road, Newhouse, and land incorporating CfS/MIR Site 0001/12 Newhouse, from the Green Belt and its re-designation for a mix of uses (SM001 and SM026).

J & P Hannaway (227) seeks the allocation of the whole of CfS/MIR Site 0007/11 as Proposed Housing Development Site 07/11 (Map Book 9.4) and changes to the Proposals Map to reflect the area used by ASAP Contracts comprising of yard building and area covered by waste management licence.

T Gorman Haulage Ltd (239) seeks that the urban boundary is moved to creating a natural line that encompasses CfS/MIR Site 0017/07 Theodore Fields, Burnhead Road, Airdrie (SM038).

Sir Frank Mears Associates (261) seeks the eastward expansion of the urban boundary of Cleland from Biggar Road to the A73 (SM003).

Network Rail (274) seeks the addition of the following to Policy AD 4:

"Notes: Railway infrastructure is not included in the requirements of Policy AD 4."

Summary of response by planning authority:

Ogilvie Homes (188.235); (188.237) and (188.238), and Walker Group (Scotland) Ltd (192) - Westerwood is a designed neighbourhood, reflective of the original Cumbernauld New Town Plan, and the Green Belt boundary is sensitive to those original design principles. The Council considers that these sites still play an important role in preserving that original designed landscape setting, so does not accept that the status of these sites should be changed. Ogilvie Homes (190) The Council does not accept that changes are needed in respect of this objection.

Wording Amendments

Manus O'Donnell (202), Barratt Homes West Scotland (231.305), Miller Homes (258), Barratt Homes West Scotland & CALA Homes (West) Ltd (264.345), Homes for Scotland (266) and Network Rail (274) - The Council is being consistent with both Scottish Planning Policy (AD60) and Clydeplan Strategic Development Plan (AD59) in setting out that the Green Belt is not generally considered to be a suitable location for housing, unless there is a specific locational need. The seemingly *carte blanche* elevation of Green Belt land to becoming equally suitable for the full range of housing seems to be completely illogical and strikes at the very heart of the long-established concepts behind designating them in the first place, such as focussing development towards the reuse of abandoned and derelict land within settlements. However, the Council recognises that there are circumstances under which it is necessary to consider, and sometimes allow, housing to be developed on hitherto Green Belt land. Policy PROM LOC 3 sets out a clear, logical and sustainable sequential approach which explains how and when Green Belt land will be considered for general housing. The purpose of Policy AD 4 is to explain specifically what type of housing the council considers appropriate to be directed specifically towards Green Belt locations.

There is no requirement to add a specific note on railway infrastructure to Policy AD 4, precisely because it is *sui generis*, so the Council does not accept that changes are needed in respect of this objection.

The Council does not accept that any changes to the wording of Policy AD 4 are necessary.

Arrandale Ltd (204) and Newhouse Investments Ltd (187) - The Council considers that there is no requirement to release Green Belt land for mixed uses, or employment uses, as there is sufficient Brownfield locations to meet demand, so no changes are needed in respect of this objection.

J & P Hannaway (227) - The Council does not accept that changes are needed in respect of this objection.

T Gorman Haulage Ltd (239) - The Council does not accept that changes are needed in respect of this objection.

Sir Frank Mears Associates (261) - The Council does not accept that changes are needed in respect of this objection. Part of the land on which Sir Frank Mears Associates (261) seeks the eastern expansion of Cleland to the A73 comprises CfS/MIR Site 0025/19. It should be noted that the following, as shown in AD72, expressed support for the Council's non-allocation of CfS/MIR Site 0025/19 for housing, so are not listed at the

beginning of this Schedule 4: Andrea Fraser, Michelle Smith, Paul Smith, John Percy, Alison Irvine, Frank McBride, James Dooey, Michelle Rae, Gavin Rae, Adam Rae, John Rae, John Alcorn, Janice Arnott, Robert Bell, Ellen Bell, Deborah Finnie, Stacy Banks, David Young, Margaret McSpadyen, Catherine McBride, Una Alcorn, Robert Alcorn, Simon Kirkwood, Derek Fearon, Alex Young, Mary McFarlane, Rebecca Fearon, Anna T Kane, Gerard Brian McFarlane, Miriam Purves, Julia Fearon, Louise Roarty, Christopher Roarty, Benny Smith, Stephen Roarty, Laura Feighan, Robert Arnott, Pamela McShane, Douglas Wilson, Leanne Wilson, Margo Young and Patrick Ferguson

Reporter's conclusions:

Settlement boundary at Westerwood Golf Club, Cumbernauld

1. Representation 188.235 (Settlement boundary at Westerwood Golf Club, Cumbernauld) is addressed in issue 16 General Urban Area.

Sites A and B, Dunning Drive and St Andrew's Drive, Cumbernauld

2. Representations 188.237 and 188.238 (Sites A and B, Dunning Drive and St Andrew's Drive, Cumbernauld) are addressed in issue 16.

Site at Knownoblehill, Cleland

3. Representation 190 (site at Knownoblehill, Cleland) is addressed in issue 17 Green Belt Purpose of Place.

No proper assessment

4. Representation 192 (no proper assessment) is addressed in issue 17.

Land south of Edinburgh Road, Newhouse - Greenside Farm

5. Representation 204 (land south of Edinburgh Road, Newhouse - Greenside Farm) is addressed in issue 17.

Theodore Fields, Burnhead Road, Airdrie

6. As well as being included in issue 18, representation 239 is recorded in issues 4 and 17. What follows addresses that part of representation 239 regarding the green belt.

7. The representation says the urban boundary takes an unnatural course to exclude the site at Theodore Fields. The site does not contribute to the green belt. It is used for fly tipping, joy riding, vandalism and car dumping. It is detrimental to local amenity.

8. I note that the green belt boundary in the proposed plan is the same as that in the currently adopted local plan. On the south side of the representation site, the boundary follows the rear boundaries of houses on the north side of Church Crescent. I find that this is a clearly demarcated line, reinforced by the presence of a belt of trees.

9. On the west side of the representation site, the green belt boundary follows Burnhead Road. Burnhead Road separates the built-up area of Clarkston and associated open space from countryside to the north and east. I find that this is a well-defined line.

10. Taking account of the foregoing, I find that the green belt boundary has a natural, well-defined and robust character. In landscape terms, the northern and north-eastern boundaries of the representation site are weakly defined. They would provide a green belt boundary that was less satisfactory than the boundary in the proposed plan.

11. Regarding detriment to local amenity, if the condition of the site were seen as adversely affecting the amenity of its surroundings, it would be open to the council to take action to require proper maintenance of the site, for example by serving a notice in terms of section 179 of the Town and Country Planning (Scotland) Act 1997 (as amended).

12. I conclude that the site makes a useful, if local, contribution to green belt objectives. In response to the representation, the proposed plan need not be altered.

Land east of Biggar Road, Cleland

13. Representation 261 (land east of Biggar Road, Cleland) is addressed in issue 16: General Urban Area.

Reuse of vacant or underutilised industrial land and other matters

14. A representation says that housing development needs to take place in locations where people want to live and where development can viably take place. It goes on to state that brownfield sites are not intrinsically more sustainable than those in the green belt nor can development on one be readily substituted to the other. In this regard the fourth bullet point of the policy is unnecessary and it is suggested that this should be deleted.

15. The fourth bullet point is considered in paragraph 20 below.

16. A representation seeks insertion of “and, if required, to mitigate deficits in the 5-year housing land supply” into the text in the box under “9 housing”.

17. I find that the meaning of “if required” is not clear. This could cause uncertainty in interpretation of the green belt policy. The desire to make reference to the five-year effective housing land supply is adequately addressed by the change to PP 4 ‘Purpose of Place Policy’ that is recommended in issue 17. Recommended modifications to policy PROM LOC3 ‘Housing development sites’, outlined in issue 4, also provide additional clarity on how land release will be considered in the event of an insufficient effective housing land supply.

18. Representation 258 says it is not the responsibility of the developer to consider alternative sites when the council cannot demonstrate existence of a five-year effective land supply for new housing. For this reason, the third and fourth bullet points in AD 4 Amount of Development Policy should be deleted.

19. I note that the bullet points apply to all kinds of development, not just housing development and it would ordinarily rather than only in circumstances where there is not at least a five-year effective housing land supply. Regarding the third bullet point, the evidence sought is presumably intended to show whether there are or are not alternative sites that are not in the green belt. I find that this could be relevant to assessment of a proposal. I also bear in mind the changes to the PP 4 Purpose of Place Policy that are recommended in 17. Significantly, the recommended modifications to policy PROM

LOC3 in issue 4 would remove the council's proposed sequential approach to land release if a shortfall in the five-year effective housing land supply is identified. That (modified) policy would have primacy in such circumstances. From all this, my conclusion is that the third bullet point should not be deleted.

20. Regarding the fourth bullet point, I note that one purpose of the green belt policy is "support regeneration by directing growth to urban areas". Support for regeneration is a strategic objective of Clydeplan (Clydeplan, paragraph 8.15). I would expect the council to be monitoring re-use of vacant land and underutilised industrial land and to be at least as well-informed as developers regarding availability of such land. I also note a search for suitable alternative sites, carried out in response to the third bullet point, would presumably include consideration of vacant land and underutilised industrial land. My conclusion is that the fourth bullet point is neither appropriate nor necessary and should be deleted.

Allowing development in the green belt

21. Representation 202 acknowledges that policy PROM LOC3 Housing Development Sites provides a mechanism to address housing land shortfall. The representation contends that AD 4 Amount of Development Policy must be amended to reflect policy PROM LOC 3. The representation seeks deletion of "Development not meeting these requirements will not be supported" and insertion of "In the event of a shortfall in effective housing land being identified, the Council will support development for housing in the green belt where it can be demonstrated that the tests of Policy PROM LOC 3 Housing Development Sites have been satisfied".

22. I am recommending that the fourth bullet point be deleted (representations 266 and 258, above).

23. I note that each of the bullet points describes information that will be used in assessing proposed development. The sentence following the bullet points indicates that this information is essential. I find that, taken together, the first three bullet points and the sentence provide guidance to prospective developers. The guidance is not restricted to proposals for residential development. It is desirable that prospective developers are encouraged to submit information that is needed to enable proper assessment of their proposals.

24. I find that it would be helpful if AD 4 drew attention to PROM LOC3, which as already noted in paragraphs 17 and 19 above, is also subject to a recommended modification in issue 4.

25. My conclusions are that the sentence following the bullet points should not be deleted and that there should be reference to policy PROM LOC3.

Onerous and excessive

26. Representations say that the assessment of appropriateness in policy AD 4 is onerous and excessive and is not in accordance with Scottish Planning Policy or Clydeplan policy 8. It has been suggested that the second sentence of policy AD 4 should be amended to read:

> "The need for an assessment depends on the combination of type (Use

Class), scale and location of development and whether a five-year effective housing land supply is maintained at all times."

27. In addition, after the first paragraph in the AD 4 Amount of Development Policy Guidance, it has been suggested that the following paragraph should be inserted:

> "Where it is demonstrated that a five-year effective housing land supply is not maintained at all times, the Green Belt will be considered to have a purpose in providing additional land for housing development. In such a circumstance, the presumption in favour of development that contributes to sustainable development will be a significant material consideration. Proposals for housing development will therefore only be required to demonstrate their compatibility with the Green Belt, and contribution towards sustainable development, in the accompanying assessment of appropriateness."

28. In AD 4, I note that the first paragraph applies to development of all types. I find that the proposed change to this paragraph would not fit comfortably into this context.

29. I find that the desire to make reference to the five-year effective housing land supply is adequately addressed by the change to PP 4 Purpose of Place Policy Guidance that is recommended in issue 17.

30. My conclusion is that the proposed amendments are not needed in view of the change recommended in issue 17.

Sykeside Road, Airdrie

31. The representation relating to land at Sykeside Road, Airdrie is addressed in issue 4 Housing Development Sites.

Railway infrastructure

32. Regarding representation 274, I note that railway infrastructure is not included in any of the uses numbered 1 to 11. I find that railway infrastructure is a utility. Policy AD 4 indicates that utilities would be considered in relation to policies EDQ, PROM and PROT. PROM ID 1 POLICY Transport Improvements says developments will be assessed for their contribution to modal shift in line with the sustainable modal hierarchy and current strategies in accordance with the EDQ policies.

33. I note that PP 4 Purpose of Place Policy Guidance says assessment of appropriateness will include whether there is a specific locational requirement for the proposal, whether it would result in significant economic benefit and what impact it might have on sustainable modes of transport.

34. I find it likely that railway infrastructure development would be viewed favourably in the light of the considerations in the two preceding paragraphs. My conclusion is that it would be neither appropriate nor necessary to alter the proposed plan in the way suggested.

Reporter's recommendations:
1. In policy 4 Green Belt, AD 4 Amount of Development Policy Guidance, add the following to the paragraph beginning "All proposals for housing of over 10 units": Attention is also drawn to the requirements of PROM LOC3 POLICY Housing Development Sites. 2. In policy 4 Green Belt, AD 4 Amount of Development Policy Guidance, delete the fourth bullet point.

Issue 019	**Countryside - Purpose of Place**	
Development plan reference:	PP5 Countryside Purpose of Place Policy and Guidance Page 77	**Reporter:** Sue Bell
Body or person(s) submitting a representation raising the issue (including reference number):		
Barratt Homes West Scotland (231) Ian MacFarlane (253) Barratt Homes West Scotland & CALA Homes (West) Ltd (264) Homes for Scotland (266) Axis (288)		
Provision of the Development Plan to which the issue relates:	5 Countryside Policy PP 5 Purpose of Place North Lanarkshire Council will support the Countryside by accommodating limited development such as Visitor Economy related development, extending existing business and settlements, and agricultural diversification. Policy PP 5 Guidance Applicants will be expected to provide the identified appraisals or assessments, which should be submitted with any planning application to allow consideration of the proposal. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		
Barratt Homes West Scotland (231.305) and supporting documents RD187-RD195 and Barratt Homes West Scotland & CALA Homes (West) Ltd (264) and supporting documents RD238-RD234, object to Policy PP 5 on the grounds that the Countryside policies are unchanged since the LDP Proposed Plan published in March 2017. There is no recognition that applications for housing development in the Countryside will be positively considered where it is demonstrated that a five-year effective housing supply is not maintained at all times. The Assessment of Appropriateness is onerous and excessive and will block any new development coming forward. The Policy does not accord with Scottish Planning Policy (AD60) and Clydeplan Strategic Development Plan (AD60) Policy 8. Ian MacFarlane (253) objects to Proposed Housing Development Site 11/07 Easterton Farm, Caldercruix (Map Book 7.6), on the grounds that the development would set a precedence in the Countryside, affect local environment and biodiversity features (EU directive to conserve wild bird, their eggs, nests, habitats and feeding grounds) and would have an impact on local ecosystems. He also questions who would pay for the Activity Survey to assess the potential threat to protected species. Homes for Scotland (266) and supporting documents RD235-RD237, objects to Policy PP 5 on the grounds that this Policy and the Green Belt Policy PP 4 appear to be the same. Presenting evidence on the reuse of vacant land is not relevant and should not be a policy requirement. Settlements in the Countryside will have location-specific needs for housing and other development that cannot be satisfied on the nearest vacant former	

industrial land. Scottish Planning Policy (AD60) states that it may be appropriate to guide developments in the Countryside to locations within or adjacent to settlements. The requirement for the documents listed is unnecessarily onerous and would be completely unfeasible for those pursuing smaller scale development to provide.

Axis (288) objects to Policy PP 5 on the grounds that there is a potential conflict between Policies PP 5 and PROM ID 2 (this is also stated at Issue 07 Policy PROM ID 2 Utilities Improvements). Policy PROM ID 2 supports waste management development on waste management sites licensed by SEPA. The Plan fails to identify locations of licensed sites and their extent is not illustrated on the Proposals Map or Area Strategy Maps. Waste management sites, such as FCC's Greengairs Waste Management Complex, are currently shown as being vacant land with open countryside. Showing the extent of waste management sites and other relevant locations gives greater certainty and clarity in terms of both Policy PROM ID 2 and Policy PP 5. Further clarity could be provided by inserting a further criterion into Policy PP 5, stating that waste management developments on existing waste management sites will be deemed acceptable.

Modifications sought by those submitting representations:

Barratt Homes West Scotland (231.305) and Barratt Homes West Scotland & CALA Homes (West) Ltd (264) seek the following additional text to be added:

Policy PP 5 after the first paragraph:

[*Where it is demonstrated that a five year effective housing land supply is not maintained at all times, additional land for housing development may be granted planning permission in the Green Belt and Countryside.*]

PP 5 Purpose of Place Policy Guidance after the bullet points in paragraph 3:

[*Where it is demonstrated that a five year effective housing land supply is not maintained at all times, then the presumption in favour of development that contributes to sustainable development will be a significant material consideration. In such instances, proposals for housing development will therefore only be required to demonstrate compatibility in design terms with the Countryside, and its contribution towards sustainable development, in the accompanying assessment of appropriateness.]*

Ian McFarlane (253) seeks the removal of site Proposed Housing Development Site 11/07 (Map Book 7.6).

Homes for Scotland (266) seeks that the pre-amble text from page 76 is added into Policy PP 5 to explain that the countryside is different from the Green Belt, and the deletion of PP 5 Purpose of Place Policy Guidance altogether.

Axis (288) seeks that the following modifications are made:

Clearly identify the extent of SEPA licensed waste management sites on the Proposals Map and within the wording of the LDP; and include an additional criterion to reflect the wording of Policy PROM ID 2 regarding development of waste management facilities on existing waste management sites.

Summary of response by planning authority:

Barratt Homes West Scotland (231.305) and Barratt Homes West Scotland & CALA Homes (West) Ltd (264) - The Council considers that the existing Policy and Guidance wording provides the current context for assessing developments in the Countryside and supports the Vision and Spatial Strategy of the Plan. Policy PROM LOC 3 identifies a 6-step sequential approach to be followed in the event that a shortfall of housing land arises at any time during the lifetime of the Plan, as identified by a Housing Land Audit. This housing land sequential approach lists non-urban land, which includes Green Belt and Countryside by implication, with no specific protections as the 4th preference. It is clear that the only category of site that the Council will not consider appropriate for housing under any circumstances is land covered by an international-level protection. As a result, the Council does not consider that further changes to the Policy and Guidance are necessary.

Ian MacFarlane (253) - The Main Issues Report 2015 (AD21) identified a shortfall in the supply of land for housing in the Airdrie/Coatbridge Housing Sub-Market Area, in which Caldercruix is located. Proposed Housing Development Site 07/11 was duly assessed as appropriate to be allocated as part of strategy to tackle this shortfall through the Site Selection Methodology (AD25). It is enclosed by the existing urban area to the north and east, the Helensburgh/Milngavie to Edinburgh passenger rail line (from where the urban area continues south to the A89 Airdrie Road) and a locally deeply incised burn to the west. Issues, such the development affecting local environment and biodiversity features, impact on local ecosystems would be dealt with through the determination of any planning applications submitted. The Council maintains that this site has been appropriately allocated for development, does not set a precedence and does not agree that it should be removed.

Homes for Scotland (266) - The Council acknowledges that Policies PP 4 and PP 5 are similar, but stresses that their respective Guidance is different. Policy PP 5 does state that all of the uses that are appropriate in the Green Belt are also appropriate in the Countryside, however, proposals for limited expansion of existing businesses and settlements, agricultural diversification and local job creation will be encouraged.

Scottish Planning Policy states that it may be appropriate in the Countryside to guide developments to locations within or adjacent to settlements. However, this is in “Accessible” or “Pressured Rural Areas”, of which there are none in North Lanarkshire according to the Scottish Government's Urban Rural Classification 2016, where there is a danger of unstainable growth in long-distance, car-based commuting, or suburbanisation of the countryside. Seeking applicants to provide an assessment of appropriateness, such as a business plan, evidence concerning the reuse of the vacant land, as well as a supporting statement, serves to offer a level of justification of any proposed development in the determination of a planning application. The pre-amble text on Page 76 is intended to explain the difference between the Countryside and Green Belt and cannot be considered to be Policy. Consequently, the Council disagrees that any further changes are required.

Axis (288) - The Council does not consider it necessary to identify licensed waste management sites within the Plan, on the proposal map, or on Area Strategy maps, as these sites may change or cease operation during the plan period. Each planning application has to be assessed on its own merits and, therefore, the Council cannot state that any further developments of existing waste management sites would be deemed

acceptable. The Council disagrees that any further changes are required.

The Council does not agree that the wording of Policy PP 5 requires to be changed to ensure that only appropriate sites within the industrial land supply benefit from an "in-principle" acceptance as a location for waste management development. Each development is subject to the assessment criteria listed in Policy PROM ID 2 Guidance and there could be sites outwith the industrial land supply that are more suitable for waste management development.

Reporter's conclusions:

Approach for considering housing development in the Countryside

1. The representations consider the assessment of appropriateness set by policy PP 5 to be onerous and excessive, particularly in the event of a five-year effective housing land supply not being maintained. Further, they consider the proposed approach is not consistent with the requirements of either Clydeplan or Scottish Planning Policy.

2. Policy PP 5 sets out the proposed approach for considering applications for development in the countryside and the types of information that will be required in order to justify the need for a countryside setting. These considerations would apply to any type of proposed development within the countryside (subject to thresholds set out in policy AD 5) and are not restricted to applications for housing (whether or not a shortfall in housing occurs).

3. The proposed approach is designed to support the vision and spatial strategy of the modified proposed plan by ensuring that the character of countryside areas is maintained. It requires a detailed assessment of the need and appropriateness of the proposed development in its proposed setting. Such an approach aims to avoid sporadic and isolated development in the countryside. To that end, I find that the approach would contribute to guiding the right type of development to the right place, consistent with the requirements of Scottish Planning Policy.

4. Development plans are required to set out policies and guidance for the future development of land and buildings. Scottish Ministers expect plans to be up-to-date and relevant. Planning authorities should maintain a generous supply of land for house building and there should always be enough effective land for at least five years. Conclusions in relation to the adequacy of the housing land identified by the modified proposed plan are addressed under issue 4.

5. Policy PROM LOC3 sets out the approach that should be taken, should a shortfall arise during the life of the plan. Representations have been received about that proposed approach, including its compliance with Scottish Planning Policy and Clydeplan. These points are also addressed under issue 4, where we have recommended modifications to policy PROM LOC3.

6. Policy PP 5 states that "All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan." Thus, I conclude that should a shortfall in the five-year effective land supply occur, the approach set out in Policy PROM LOC3 (as modified by this examination), would apply.

7. In conclusion, I find that the considerations set out Policy PP 5 are helpful in ensuring

that any consented development is consistent with and would retain the character of the countryside. In the event of a shortfall in the five-year effective land supply, the applicable criteria outlined in the modified version of policy PROM LOC3 would be engaged. Therefore, I do not consider it either necessary or appropriate to modify policy PP 5, given this matter is adequately addressed elsewhere and as the policy applies to all forms of development in countryside locations.

Adequacy of housing supply

8. The representation suggests there is a deficiency in the allocation of residential housing land, in particular for low-cost affordable housing. To help address this suggested shortfall, the representor proposes the allocation of a site at South Mynot. The issue of the adequacy of the housing supply in general and the suitability of the proposed site in particular are addressed as part of issue 4.

Easterton Farm, Caldercruix (Map Book 7.6)

9. The representations in respect of this site is considered as part of issue 04.

Similarity between Countryside and Green Belt Policies

10. My following assessment also takes account of similar comments raised under issue 20.

11. The modified proposed plan identifies five broad 'land use character areas'. The purpose of each character area is set out in the preamble to the relevant policies.

12. I accept that there are similarities between policy AD 5 and policy AD 4 in that they both seek to contribute to placemaking by ensuring that appropriate types and scales of development are accommodated within the countryside and green belt respectively. Nevertheless, there are differences in the criteria, which relate to the geographic areas to which each policy applies; in the requirements for supporting information that applicants are required to supply; and the type of development that would be supported. In particular, limited expansion of existing businesses and settlements, agricultural diversification and local job creation are all encouraged within the countryside, but not within the green belt.

13. I find that the approach of defining criteria to direct the right development to the right place is consistent with the requirements of Scottish Planning Policy. The differences in criteria included in policies AD 5 and AD 4 reflect the greater ability of the countryside to accommodate certain forms of development, whilst maintaining its land use character.

14. I find that the text on page 76 of the modified proposed plan is helpful in explaining the distinctions between the countryside and green belt. Nevertheless, I do not consider that adding this explanatory text to the policy wording would strengthen either the interpretation or application of the policy. No modification is required.

Criteria for assessment of housing development in the Countryside

15. My following assessment considers those representations that have been received both in respect of policy PP 5 Purpose of Place Policy and the supporting Amount of Development Policy AD 5 (issue 20) in respect of the nature and application of the criteria

for assessing housing proposals.

16. The representor considers that the factors that must be considered in the assessment of appropriateness of housing in the countryside are too onerous. The representation refers, in particular, to evidence regarding the re-use of vacant or underutilised industrial land. It considers that there will be location-specific needs for housing and other development, which may not be close to where there is vacant land.

17. Scottish Planning Policy sets out policy principles for promoting rural development. The planning system should promote a pattern of development that is appropriate to the character of the particular rural area and the challenges it faces; and it should encourage rural development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality.

18. Guidance as to the content of the spatial strategy is also provided in Scottish Planning Policy. Amongst other things, the spatial strategy should promote "economic activity and diversification, including, where appropriate, sustainable development linked to tourism and leisure, forestry farm and croft diversification and aquaculture, nature conservation, and renewable energy developments, while ensuring that the distinctive character of the area, the service function of small towns and natural and cultural heritage are protected and enhanced." It should also make provision for housing in rural areas, taking account of the different development needs of local communities.

19. In addition, at paragraph 40, Scottish Planning Policy sets out an expectation that spatial strategies should consider the re-use or re-development of brownfield land ahead of development on greenfield sites.

20. The modified proposed plan includes a spatial strategy, which addresses these items. It sets out those locations where new development will be encouraged, including in planned extensions to existing settlements. The four bullet points listed in the guidance to policy AD 5 (which in issue 1 we recommend becomes part of the policy) address considerations for determining whether a countryside location for development is appropriate, in line with Scottish Planning Policy. This includes promoting the re-use or underutilised industrial land.

21. It is true that the distribution of vacant land may not always coincide with where development of a particular type is required. Paragraph 2 of the guidance box for policy AD 5, recognises this by explaining that "Appropriateness refers to the nature and scale of the development and whether it would be more appropriate in a Land Use Character Area designated for the size and class of development proposed, or **whether there are considerations which can be introduced to justify that the development is appropriate for the Countryside,** supported by a business plan, or statement." (my emphasis added). I conclude that this provides sufficient flexibility within the policy, and would allow for development on greenfield land, in countryside areas, where particular circumstances justify this.

22. The representor has referred to Scottish Planning Policy, which states that it may be appropriate to guide new development to locations within or adjacent to settlements. Nevertheless, I note that this approach is proposed for new housing development in accessible or pressured rural areas, where there is a danger of unsustainable growth in long-distance car-based commuting or suburbanisation of the countryside. The council has indicated that according to the Scottish Government's Urban Rural Classification

2016, there are no pressured rural areas within North Lanarkshire.

23. The 'guidance' box on page 78 of the modified proposed plan (which in issue 1 we recommend should be amalgamated with the policy) sets out the factors that will be considered when assessing applications for development in the countryside. These considerations appear to be consistent with the requirements of Scottish Planning Policy in supporting a spatial strategy that aims to direct the right development to the right place and in encouraging the reallocation of brownfield land, which may include underused, vacant or derelict land.

24. I accept that the policy and assessment criteria set out in policies PP5 and AD 5 are based on an assumption that the council has maintained a five-year effective land supply. Should that not be the case, then there may be arguments in support of particular proposed developments within countryside areas, to address this.

25. The circumstances and approach to be taken in the event of a shortfall in the five-year effective housing land supply are already set out in Policy PROM LOC3 (as modified). Representations about the practicality and appropriateness of the proposed sequential approach set out in that policy have been considered in this examination as part of issue 4. This has concluded that some modifications are required to the approach. Nevertheless, I do not see a need to repeat those requirements as part of this policy. The wording of both policy PP 5 and AD 5 is clear in stating that "All proposed development will be subject to assessment against legislation and other Policies in the Plan." Thus, I consider it is clear that should there be a shortfall in the five-year effective housing land supply, then the criteria set out in Policy PROM LOC3 would apply.

26. In conclusion, I find that the assessment criteria set out in policy AD 5 provide for the council to consider the justification for the proposed development in a countryside setting. This in turn would ensure the maintenance of the character of the land use character area, thereby supporting the spatial strategy, consistent with the overall aims of Scottish Planning Policy. Consequently, I do not consider that any modifications to the policy are necessary.

<u>Waste Management sites</u>

27. The points raised by representation 288 in relation to waste management sites are addressed under issue 7 Utilities Improvements.

Reporter's recommendations:

No modifications required.

Issue 020	**Countryside - Amount of Development**	
Development plan reference:	AD5 Countryside Policy and Guidance Page 78	**Reporter:** Sue Bell

Body or person(s) submitting a representation raising the issue (including reference number):

Barratt Homes West Scotland (231)
Kapital Residential Ltd (234)
Ian McFarlane (253)
Barratt Homes West Scotland & CALA Homes (West) Ltd (264)
Homes for Scotland (266)
Network Rail (274)

Provision of the Development Plan to which the issue relates:	5 Countryside Policy AD 5 Amount of Development Applications for planning permission for new development will be assessed for their implications related to the amount of development proposed. Policy AD 5 Guidance Applicants will be expected to provide the identified appraisals or assessments, which should be submitted with any planning application to allow consideration of the proposal. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

Planning authority's summary of the representation(s):

Barratt Homes West Scotland (231.305) and supporting documents RD187-RD195, and Barratt Homes West Scotland & CALA Homes (West) Ltd (264) and supporting documents RD228-RD234, object to Policy AD 5 on the grounds that there is no recognition that applications for housing development in the Green Belt will be positively considered where it is demonstrated that a five year effective housing supply is not maintained at all times. The Policy does not accord with Scottish Planning Policy (AD60) and Clydeplan (AD59) Policy 8 as it will block any new development coming forward.

Kapital Residential Ltd (234) and supporting documents RD196 & RD197, objects to Policy AD 5 on the grounds that there is insufficient allocation of residential development land. In particular for sites for low cost affordable housing.

Ian MacFarlane (253) objects to the allocation of Proposed Housing Development Site 11/07 Easterton Farm, Caldercruix (Map Book 7.6), on the grounds that the location of the development does not enhance existing houses, would adversely affect amenity, noise, disturbance and pollution and is contrary to the Council's open space policy.
Homes for Scotland (266) and supporting documents RD235-RD237, objects to Policy AD 5 on the grounds that this Policy and the Green Belt Policy appear to be the same. Presenting evidence on the reuse of vacant land is not relevant and should not be a policy requirement. Settlements in the Countryside will have location-specific needs for housing and other development that cannot be satisfied on the nearest vacant former industrial land. Scottish Planning Policy states that it may be appropriate to guide developments in the Countryside to locations within or adjacent to settlements.

Network Rail (274) and supporting documents RD238-RD240 objects on the grounds that the Policy does not give a clear indication as to whether or not it applies to the rail network, as it does not fit into any of the uses listed in the associated tables and no guidance for *sui generis* has been provided.

Modifications sought by those submitting representations:

Barratt Homes West Scotland (231.305) and Barratt Homes West Scotland & CALA Homes (West) Ltd (264) seek the amendment of the second sentence of Policy AD 5 to read:

"The need for an assessment depends on the combination of type (Use Class), scale [, *location of development and whether a five year effective housing land supply is maintained at all times.*]

And that the following paragraph should be inserted after the second paragraph in the *AD 5 Amount of Development Policy Guidance*:

[*Where it is demonstrated that a five year effective housing land supply is not maintained at all times, the Countryside will be considered to have a purpose in providing additional land for housing development. In such a circumstance, the presumption in favour of development that contributes to sustainable development will be a significant material consideration. Proposals for housing development will therefore only be required to demonstrate their compatibility with the Green Belt, and contribution towards sustainable development, in the accompanying assessment of appropriateness.*]"

Kapital Residential Ltd (234) seeks the inclusion of additional allocations of land for housing, specifically to include land at South Myvot extending to approximately "15 acres" (*sic*), with a sustainable capacity of around 100 houses, the majority of which could be delivered for affordable housing (CfS Site 0010/06).

Ian MacFarlane (253) seeks the removal of Proposed Housing Development Site 11/07 (Map Book 7.6).

Homes for Scotland (266) seeks the removal of the fourth bullet point of the Policy. Full Representation is attached dealing with matters in the round. (RD237 Response to North Lanarkshire Local Modified Proposed Local Development Plan).

Network Rail (274) notes that railway infrastructure is not included in the requirements of Policy AD 5.

Summary of response by planning authority:

Barratt Homes West Scotland (231.305) and Barratt Homes West Scotland & CALA Homes (West) Ltd (264) - The Council considers that the existing Policy and Guidance wording provides the current context for assessing developments in the Countryside and supports the Vision and Spatial Strategy of the Plan. Policy PROM LOC 3 identifies a 6-step sequential approach to be followed in the event that a shortfall of housing land arises at any time during the lifetime of the Plan, as identified by a Housing Land Audit. This housing land sequential approach lists non-urban land, which includes Green Belt and Countryside by implication, with no specific protections as the 4th preference. The only category of site that the Council will not consider appropriate for housing under any

circumstances is land that is covered by an international-level protection. As a result, the Council does not consider that further changes to the Policy and Guidance are necessary.

Kapital Residential Ltd (234) - The Council maintains that sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that this does not represent a sustainable location for any further release. The Council takes into account the identified requirement for affordable housing in the Cumbernauld Housing Sub-Market Area by the continued use and implementation of its Affordable Housing Policy (AD50).

Ian MacFarlane (253) - The Main Issues Report 2015 (AD21) Identified a shortfall in the supply of land for housing in the Airdrie/Coatbridge Housing Sub-Market Area, in which Caldercruix is located. Proposed Housing development Site 11/07 was duly assessed as appropriate to be allocated as part of strategy to tackle this shortfall through the Site Selection Methodology (AD25). It is enclosed by the existing urban area to the north and east, the Helensburgh/Milngavie to Edinburgh passenger rail line (from where the urban area continues south to the A89 Airdrie Road) and a locally deeply incised burn to the west. Issues, such as the potential adverse impact upon residential amenity, noise, pollution, access and traffic will be included in the Action Programme to be addressed, through the determination of any planning applications submitted. The Council maintains that this site has been appropriately allocated for development and does not agree that it should be removed.

Homes for Scotland (266) - The Council acknowledges that Policies AD4 and AD5 are similar, but stresses that their respective Guidance is different. The Policy AD4 Guidance gives more detail on the criteria for assessing developments in the Land Use Character Area Countryside. Scottish Planning Policy states that it may be appropriate in the Countryside to guide developments to locations within or adjacent to settlements. However, this is in “Accessible” or “Pressured Rural Areas”, of which there are none in North Lanarkshire according to the Scottish Government's Urban Rural Classification 2016, where there is a danger of unstainable growth in long-distance, car-based commuting, or suburbanisation of the countryside. Seeking applicants to provide evidence concerning the reuse of the vacant land, as well as a supporting statement, serves to offer a level of justification of any proposed development in the determination of a planning application. Consequently, the Council disagrees that the fourth bullet point be removed, or that any further changes are required.

Network Rail (274) - The Council considers that there is no requirement to add a note to this Policy on railway infrastructure. The Town and Country Planning (Use Classes) (Scotland) Order 1997 (AD66) recognises some uses as *sui generis*, because they are unique by definition, meaning that it is beyond guidance. Changes to the Town and Country Planning (Use Classes) (Scotland) Order 1997 (AD66) are not a Development Plan matter**.** The Council does not agree that any changes are required.

Reporter’s conclusions:

<u>Criteria for assessment of housing development in the Countryside</u>

1. Policy AD 5 sets out the thresholds above which different forms of development are required to provide information in support of a countryside location. Provision for housing in the countryside is addressed by the criteria set out in Policy PP5. My findings in

respect of these criteria are set out in response to Issue 19 and are not repeated here.

2. Conclusions in relation to the adequacy of housing land are addressed within issue 4. The representation in respect of the sites at Chapelton, Condorrat (SM014 and SM015) is addressed in issue 4 also.

Site 11/07 Easterton Farm, Caldercruix (Map Book 7.6)

3. The representation in respect of this site is addressed as part of issue 4.

Similarity between Countryside and Green Belt Policies

4. The representation is considered with similar comments as part of issue 19.

Application of Policy to rail network

5. The rail network has unique requirements and as such does not fall within the use classes set out in the Town and Country Planning (Use Classes) (Scotland) Order 1997. It is treated as sui generis in recognition of the special and specific nature of the development requirements.

6. Railways form an important component of transport infrastructure. This importance is recognised in the modified proposed plan through policy PROM ID1 Transport Improvements. This policy supports sustainable, multi-modal transport improvements that are set out in the various transport strategies that are listed in the policy.

7. The individual nature of each potential sui generis use is such, that I find it would be impractical and unnecessary to include each and every possibility within the policy. Support for improvements to the rail network as part of wider transport strategies is already provided for in the modified proposed plan. I do not therefore consider that any modifications are required.

Reporter's recommendations:

No modifications required.

Issue 021	**Contributions to Infrastructure**	
Development plan reference:	CI Contributions to Infrastructure Policy, Categories and Guidance Pages 80 - 81	**Reporter:** Sue Bell

Body or person(s) submitting a representation raising the issue (including reference number):

Gartcosh Tenants & Residents Association (179)
Northern Corridor Community Volunteers (185)
Ogilvie Homes (189)
Wallace Land Investments (220)
Barratt Homes West Scotland (231)
Goldcrest Partners LLP (246)
Isobel Kelly (256)
Trustees of Miss I D Meiklam (262)
Barratt Homes West Scotland and CALA Homes (West) Ltd (264)
Homes for Scotland (266)
Network Rail (274)
Rhiannon Properties Ltd (286)

Provision of the Development Plan to which the issue relates:	Placemaking Policies – Contributions to Infrastructure Policy CI Contributions to Infrastructure - North Lanarkshire Council will seek to secure developer contributions for new developments that, individually or cumulatively, generate a requirement for new or enhanced infrastructure or services. Contributions to Infrastructure Policy Categories and Guidance1 Affordable Housing in Cumbernauld Housing Sub-Market Area and 2 Education, 3 Transport and 4 Green Network Infrastructure, Amenity Space and Play across North Lanarkshire. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

Planning authority's summary of the representation(s):

Gartcosh Tenants & Residents Association (179), Northern Corridor Community Volunteers (185) and Isobel Kelly (256) object to the Council's Affordable Housing Policy on the basis that it translates into an under-provision of affordable housing across the local authority area. Common practice across many Scottish local authorities is to apply the maximum figure of 25% of the total number of houses.

There is a huge demand for social and affordable housing within the Northern Corridor and alleges that for every new development, the Council takes a commuted sum to use elsewhere for provision in Cumbernauld and beyond and to deliver its priorities elsewhere. The money should be used to rehome families in poor quality accommodation locally in Moodiesburn West.

Ogilvie Homes (189) and supporting documents RD41 & RD42, Wallace Land Investments (220) and supporting documents RD135-RD143, Barratt Homes West Scotland (231.305) and supporting documents RD187-RD195, Goldcrest Partners LLP (246) and supporting document RD210, Trustees of Miss ID Meiklam (262) and supporting document RD227, Barratt Homes West Scotland and CALA Homes (West) Ltd

(264) and supporting documents RD228-RD234 and Rhiannon Properties Ltd (286) object on the grounds that the wording suggests that there is a requirement for educational contributions to be made for ALL dwellings *with the exception of those with only one bedroom*. This cannot be justified, suggesting that the Council will seek developer contributions towards new educational infrastructure irrespective of whether or not the case for such new infrastructure has been reasonably demonstrated.

Applying a developer obligation to all development of a certain type, without establishing a more than trivial relationship to each proposal, is essentially a levy. There is no basis for infrastructure levies in any current legislative Act in Scotland.

Ogilvie Homes (189) and supporting documents RD41 & RD42, Wallace Land Investments (220) and supporting documents RD136-RD143, Barratt Homes West Scotland (231.305) and supporting documents RD187-RD195, Goldcrest Partners LLP (246) and supporting document RD210, Trustees of Miss I D Meiklam (262) and supporting documents RD227, Barratt Homes West Scotland and CALA Homes (West) Ltd (264) and supporting documents RD228-RD234 and Rhiannon Properties Ltd (286) object to the lack of forthcoming Supplementary Guidance, or Non-Statutory Planning Guidance for Contributions to Infrastructure. The Modified Proposed Plan does not provide a sufficient level of prescription regarding infrastructure actions required and expected to support the Council's development strategy, anticipated costs, or delivery timetable. The Council should be in a position to provide definitive details as to the exact extent of these matters, rather than abrogate responsibility to yet to be drafted, non-statutory "subsequent guidance" for affordable housing, education and transport infrastructure, contrary to best practice and the recommendations of Scottish Government. Statutory Supplementary Guidance should be prepared ahead of Examination of the Modified Proposed Plan and be open to full public scrutiny and Ministerial oversight.

Also object to the potential implications of this guidance (Contributions to Infrastructure) in relation to the objection to the Council's Housing Land Supply (addressed under Issue 04 PROM LOC 3 in that, com

Ogilvie Homes (189) and supporting documents RD41 & RD42, Wallace Land Investments (220) and supporting documents RD136-RD143, Goldcrest Partners LLP (246) and supporting document RD210, Trustees of Miss ID Meiklam (262) and supporting document RD227 and Rhiannon Properties Ltd (286) object to the "payback" period of 10 years. If there is unspent money at completion of development, there is no justification for the Council to hold onto it money for use at a later date.

Homes for Scotland (266) and supporting documents RD235-RD237, objects to the wording of the Affordable Housing Policy on the grounds that it should be made clear that the Cumbernauld Housing Sub-Market Area is the only location where affordable housing will be sought, and that affordable housing should be exempt from making education contributions in line with other local authorities.

Network Rail (274) and supporting documents RD238-RD240, object to the wording of the Policy in that it should be made clear that publicly funded bodies are excluded from having to make developer contributions.

Modifications sought by those submitting representations:

Gartcosh Tenants & Residents Association (179), Northern Corridor Community Volunteers (185) and Isobel Kelly (256) seek a requirement for all housing developments to provide at least 25% affordable housing, both in the Cumbernauld Housing Sub-Market Area and across the whole of the local authority area, with decisions regarding any deviation to be made by a panel of local councillors rather than with council officers with no grounding in or knowledge of the local area.

Ogilvie Homes (189), Wallace Land Investments (220), Goldcrest Partners LLP (246), Trustees of Miss I D Meiklam (262), Rhiannon Properties Ltd (286) seek the rewording of "Category C12, Education" Guidance 2nd paragraph to read as:

"A contribution towards educational infrastructure will be required from any development when it can be demonstrated that enhancements are required in order to accommodate the pupil numbers that will be generated by the development in question. Exceptions to this requirement will be applied to dwelling houses, which feature only one bedroom."

Indicative conditions attached to any agreement will include the education authority retaining any contribution payments for a maximum period of 18 months following on from the completion of the final dwelling to which the contribution relates, after which time, any element of the contribution which remains unspent will be returned to the relevant party. Phased payments of such contributions may be acceptable in most instances;" and the provision of sufficient details in the Plan regarding the timescales, extent and quantum of those developer contributions, that will/may be required in relation to both specific forms of development and also in respect of the development of specific sites.

Barratt Homes West Scotland (231.305); Barratt Homes West Scotland and CALA Homes (West) Ltd (264) offer a slightly different modification to the second paragraph of Category CI2 Education:-

DELETE: "A contribution towards education infrastructure will be expected for all dwellings, with the exception of those with only one bedroom"

and

INSERT: "*In line with tests set out in Circular 3/2012 Planning Obligations and Good Neighbour Agreements, planning obligations will only be imposed where there is a more than trivial relationship between the intervention sought and the impact of a new residential development. This will be subject of detailed analysis during the determination period of a planning application".*

Barratt Homes West Scotland (231.305), Barratt Homes West Scotland and CALA Homes (West) Ltd (264) seek the amendment of the table in *Appendix Guidance* (page 136) for CI Contributions to Infrastructure Policy to read:

"Statutory Supplementary Guidance will be prepared to set out the framework of the application of the policy, identification of need, calculation of contributions and methods of collection and management of funds. This will be subject to public consultation and examination prior to adoption".

Homes for Scotland (266) seeks further clarity on the Affordable Housing Policy in that it

should be made clear that the Cumbernauld Housing Sub-Market Area is the only location where affordable housing will be sought, and that affordable housing should be exempt from making education contributions and instead met by the Council, as is the case with other local authorities.

Network Rail (274) seeks that specific reference is added to the Policy making it clear that publicly funded bodies are excluded from having to make developer contributions.

Summary of response by planning authority:

Gartcosh Tenants & Residents Association (179), Northern Corridor Community Volunteers (185) and Isobel Kelly (256) - Affordable Housing Report background report (AD23) sets out the continuing need established through the Adopted North Lanarkshire Local Plan for the application of an affordable housing policy in the Cumbernauld Housing Sub-Market Area (HSMA), as Cumbernauld and Moodiesburn continue to experience high pressure for social housing. (AD23) also points out that owing to the impact of the application of 25% through North Lanarkshire Local Plan Policy HCF 3A Affordable Housing and the Council's New Build programme, the rate can be reduced to 20%. The Council's ultimate aim is the removal of the need for such a Policy. (AD23) also sets out that there remains no evidence to support any extension of the Affordable Housing Policy beyond the Cumbernauld Housing Sub-Market Area. In any case, the Council considers that the wording of the Policy allows for the provision of affordable housing across the wider local authority area to be required on a case by case basis, as and when a need has been identified.

The Affordable Housing Policy is applicable across the whole Housing Sub-Market Area, therefore it is appropriate that a commuted sum may be taken from one part of that Housing Sub-Market Area and used in another and vice versa, dependent upon circumstances dictated by need, tenure mix/integration, etc. Affordable Housing Supplementary Planning Guidance Note ES-SG B13 (AD47) states that the preferred option is on-site provision and this is what will be initially sought for each housing development proposal of 19 or more units. So, the policy is flexible, but also states this inter/intra Cumbernauld Housing Sub-Market area ring fencing explicitly. Under the financial regulations the Council is legislated to operate within, if such a commuted sum is not spent within 5 years of its receipt, the money must be returned to the developers/landowners. Accordingly, the Council maintains a record of any commuted sums paid into the Council by developers/landowners, how and where this money has been spent and what the balance of the affordable housing policy account is.

The Development Management process identifies the most appropriate option for each site in consultation with colleagues in Housing, as they deal with day-to-day management of the Council's stock and Common Housing Register through their network of Locality Area Housing offices.

The objector's comments regarding affordable housing delivery between 2016- 2017 are noted, but the Council considers delivery over a 5-year period, subject to the availability of funding. Some years may deliver more than others.

Ogilvie Homes (189), Wallace Land Investments (220), Barratt Homes West Scotland (231.305), Goldcrest Partners LLP (246), Trustees of Miss I D Meiklam (262), Barratt Homes West Scotland and CALA Homes (West) Ltd (264) and Rhiannon Properties Ltd (286) - For consistency and clarity, should the Reporter find it acceptable, the Council

proposes to amend the wording in line with the Affordable Housing Policy, to require that all new residential development proposals resulting in 5 or more dwellings to contribute towards education infrastructure if an identified need has been demonstrated. This will be determined on a case by case basis through the Development Management process.

The purpose of Policy CI Contributions to Infrastructure is to establish the principle that for developments that generate a requirement for new or enhanced infrastructure or services, developer contributions will be sought to offset the impact. It is stressed that there have been no objections to the principle of this policy, but rather they relate to seeking enhanced details in the Plan regarding the extent of those developer contributions in relation to both specific forms of development and also in respect of the development of specific sites. The Council maintains that it is appropriate to limit development strategy policies to matters of strategic principle, and to reserve the detail of good practice in implementing the policy to Supplementary Guidance. Infrastructure requirements will be assessed through the Development Management process to reflect up-to-date circumstances. The Council therefore disagrees that development strategy policies in themselves are insufficiently detailed.

Policy CI Contributions to Infrastructure outlines the categories for which new or enhanced infrastructure or services may be required for individual or cumulative developments. Developers would be expected to contribute towards the provision of the required infrastructure, facilities and services. Further to this, page 136 'Purpose of Guidance' of the Local Development Plan Modified Proposed Plan, outlines that associated SPG 13 Affordable Housing (AD47) will require to be updated, and that Supplementary Planning Guidance will be prepared to set out the framework for the remainder of categories under Policy CI Contributions to Infrastructure. This will set out identification of need, calculation of contributions and methods of collection and management of funds.

Planning Circular 6/2013: Development Planning (AD71) identifies matters that should not be included in Supplementary Guidance but be within the Plan, including "items for which financial or other contributions, including affordable housing, will be sought, and the circumstances where they will be sought". It further specifies suitable topics for Supplementary Guidance, provided there is an appropriate context in the Plan, including 'exact levels of developer contributions or methodologies for their calculation'. Further to this, it states that Supplementary Guidance may be prepared and adopted alongside the LDP, or subsequently. Therefore, the Council's inclusion of Policy CI Contributions to Infrastructure, its content and the Councils stated intention to produce subsequent statutory Supplementary Guidance is in line with Planning Circular 6/2013.

Matters raised regarding Housing Land Supply are addressed under Issue 04 PROM LOC 3 Housing Development Sites. The Council maintains that sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions.

Homes for Scotland (266) - The Council considers that the wording <u>is</u> clear that Cumbernauld Housing Sub-Market Area is the <u>only</u> part of North Lanarkshire where affordable housing will be sought, and that this will be applied on a case by case basis. With regard to the objection to the requirement for education contributions in addition to affordable housing, the Council considers this to be an unrealistic and unreasonable request. Where the school estate is under pressure from new development, there is no differentiation between children emanating from social or private housing and potentially triggering the need for additional facilities/capacity.

Network Rail (274) - The Council disagrees that the public sector should be exempt from contributing towards any infrastructure improvements, or connections that arise as a direct consequence of their development. The Policy clearly states that each application will be considered on a case by case basis through the Development Management process.

Reporter's conclusions:

1. I sought further information from the council on a number of aspects of this policy, including its intended approach to the production of supplementary guidance and justification for its proposed affordable housing contributions. The following conclusions take account of the additional responses from the council on these matters.

2. A number of the representations refer to a lack of detail in the policy concerning the proposed level of developer contributions, including the circumstances (location and thresholds) when such contributions will be required. This includes concern about the council's proposed approach of reserving the detail of the policy to supplementary guidance. Other representations raise concerns about the scale of development that would trigger a contribution or the level of contribution required. I deal first with the principle of deferring detail of the policy to supplementary guidance, before turning to the detailed comments about specific contributions.

Supplementary Guidance

3. Paragraphs 135 - 145 of circular 6/2013: Development Planning sets out the purpose and suitable topics to be addressed by 'statutory' supplementary guidance. That is, guidance which is adopted and issued by a planning authority in connection with a local development plan. Such guidance forms part of the development plan and will have that status for decision making. This is in contrast to non-statutory planning guidance, which does not form part of the development plan.

4. Paragraph 135 notes that the purpose of supplementary guidance is to allow plans to focus on vision, the spatial strategy, overarching and other key policies and proposals, with the detailed material contained in supplementary guidance.

5. Regulation 27(2) of The Town and Country Planning (Development Planning) (Scotland) Regulations 2008 requires that the local development plan should specifically reference those topics that will be dealt with in more detail within supplementary guidance and that the guidance should be limited to the provision of further information or detail of those policies.

6. Thus, paragraph 137 of circular 6/2013 advises that the determining factor in deciding whether a policy area or level of detail is suitable to be included within supplementary guidance, is whether it requires the level of scrutiny that would be associated with the examination of the plan.

7. The table at paragraph 139 of circular 6/2013 sets out matters that should not be included in supplementary guidance and topics that are suitable for supplementary guidance, provided there is an appropriate context in the plan.

8. Items for which financial or other contributions, including affordable housing, will be sought, and the circumstances (locations, types of development) where they will be

sought are identified in the table in paragraph 139 as matters that should not be included in supplementary guidance. However, the exact levels of developer contributions or methodologies for their calculation are suitable topics for supplementary guidance (provided there is an appropriate context in the plan).

9. Policy CI and the supporting tables on pages 80 – 81 of the modified proposed plan clearly establish the principle that the council will seek developer contributions for the four categories of infrastructure listed. That is, they state the items for which financial or other contributions will be sought.

10. Subject to my more detailed comments below in relation to the contributions for affordable housing, the table sets out the broad circumstances (location, scale of development, and level of contribution) under which provision for affordable housing will be required.

11. Likewise, subject to my conclusions in relation to the scale of development that would trigger a requirement for a contribution towards education, the broad circumstances (scale and types of development) when contributions towards education infrastructure are also set out in the table on pages 80 – 81.

12. Less detail is provided about the circumstances where contributions towards transport would be required. The council has explained that it lacks the empirical body of evidence that would enable it to be more descriptive and prescriptive over the next 10 years. Despite this deficiency in evidence, I nevertheless accept that the policy wording establishes the broad principle of requiring contributions towards transport arising from any form of development anywhere within North Lanarkshire.

13. I find that the tables on pages 80 – 81 is clear in establishing that contributions towards green infrastructure, amenity space and/or the provision of play infrastructure will be expected for all development. However, there is no indication of the scale of contributions that may be required.

14. I note that the responses do not object to the principle of contributions for any of these items; but they do question the application of these principles to particular sites or the level of contributions required. I conclude that the principle of financial contributions for the items listed above has been clearly established within the modified proposed plan and hence has been open to public consultation and examination. I am content that these are matters that could be addressed within statutory supplementary guidance, in line with the guidance set out in circular 6/2013. In particular, I note that paragraph 140 allows supplementary guidance to be prepared and adopted subsequent to the production of a local development plan.

15. My conclusions above are predicated on the production of statutory supplementary guidance, which has been subject to public consultation, approval by Scottish Ministers and formal adoption by the council as part of the local development plan. Whilst I acknowledge that non-statutory planning guidance can more readily be updated in the light of changing circumstances, the importance of the matters to be addressed in the guidance are such, that I find they fall within the definition of suitable topics for (statutory) supplementary guidance as set out in paragraph 139 of circular 6/2013.

16. In that regard, I acknowledge the concerns raised in representations that the current wording of the modified proposed plan does not make clear the status of the proposed

supporting supplementary guidance. For example, on page 12 of the modified proposed plan, there is reference to "Supplementary Guidance, or Non-Statutory Planning Guidance" for contributions to infrastructure and environmental and design qualities. Also, the tables of guidance to be prepared, set out on pages 136 – 137 of the modified proposed plan refer to "Supplementary Planning Guidance" to be prepared for CI2 Education, CI3 Transport and CI4 Green Infrastructure, Amenity Space and Play, but an update to SPG 13 Affordable Housing. I therefore accept that it is not clear, from the council's use of the term "Supplementary Planning Guidance", whether it is referring to statutory supplementary guidance or non-statutory planning guidance as defined by circular 6/2013.

17. In its response to my request for further information, the council has confirmed that it intends to consult on any proposed guidance. It has also proposed an amendment to the wording in the left hand column of the table on pages 80-81, which it considers would clarify the status of the accompanying guidance column.

18. I find that to be consistent with the requirements set out in circular 6/2013 and regulation 27 (2) of The Planning etc. (Scotland) Act 1997 as amended, the wording of the policy should be modified to clarify that further details relating to the exact levels of developer contributions or methodologies for their calculation and the implementation of the policy will be contained within statutory supplementary guidance for each category for which contributions will be sought. This will require changes to the wording on pages 12, 80 and 36 of the modified proposed plan.

19. In addition, I also recommend that the wording in the left-hand column of the table on pages 80 – 81 is modified to clarify that these topics have been identified as topics for supplementary guidance. I agree that this would be beneficial in confirming the council's intentions for this guidance and avoiding any ambiguity.

<u>CI2 Education</u>

20. The policy states that the council will seek developer contributions for "new developments that, individually or cumulatively, generate a requirement for new or enhanced infrastructure or services…". Further guidance in relation to contributions towards education infrastructure within the table on page 80 states that "A contribution towards education infrastructure will be expected for **all** dwellings, with the exception of those with only one bedroom."

21. I accept that when considered together, these statements lack clarity. They appear to suggest that developer contributions towards educational infrastructure would be required for any development of one or more houses of more than one bedroom, whether or not a need for that infrastructure had been reasonably demonstrated.

22. Circular 3/2012 'Planning Obligations and Good Neighbour Agreements' requires that where a planning obligation is considered essential, it must have a relevant planning purpose, should relate to the proposed development either as a direct consequence of the development or arising from the cumulative impact of development in the area and should be proportionate in scale and kind to the proposed development. As drafted, the policy appears to establish a blanket requirement for contributions, irrespective of whether or not a need has been demonstrated.

23. The council has proposed that the policy should be modified in line with the

affordable housing policy, to require that all new residential development proposals resulting in 5 or more dwellings to contribute towards education infrastructure if an identified need has been demonstrated. In response to my request for further information, the council has confirmed that it wishes the modified text to replace the first sentence to policy Category CI2 column 2, second paragraph on page 80.

24. I consider that the council's proposed modification would result in policy wording which confirms that contributions would only apply where an identified need has been demonstrated. It would also establish a clear threshold above which the policy would apply. I find that these additions would bring the policy into line with the tests set out in circular 3/2012. I have therefore recommended a form of wording to encapsulate these elements within the table on page 80 of the modified proposed plan.

25. Whilst I note the representations, which suggest that affordable housing should be exempt from contributions towards education provision, I do not see any justification for this. Housing of the stated scale will contribute to demands on education infrastructure, irrespective of whether or not it forms part of the affordable or private housing stock.

Payback period

26. The policy, as currently worded, proposes that any payments made towards educational infrastructure would be retained by the education authority for a period of 10 years or as otherwise agreed with the council, following the completion of the final dwelling. If not spent within this period, the money would be returned to the applicant. The representations suggest that a shorter period would be more appropriate. In a further information request I sought clarification from the council as to its justification for a 10-year retention period.

27. I can understand the desire expressed in representations that the time period should be reduced. Nevertheless, I do not accept that as the contribution would be 'triggered' by the need to provide for additional pupils generated by the additional housing, that it would be necessary for the council to expend any contributions at the outset of the development. Whilst that may be the case in some instances, there may be delays in implementing the required infrastructure.

28. I am persuaded by the council's evidence (provided in response to my rurther information request) that it can take some time to assess the full impact of developments, for children to present to the school estate and the programme of school replacement and refurbishment to be implemented. In particular, I note the council's comments that: "It could be that the purchasers of a new house have children below school age, or have children already at school, but the Council knows that those children will present for school and require a place and approximately where and when. In the case of a secondary school, that is a potential 12-year timeframe from birth."

29. In addition, I accept the council's comments that "the allocation of land, granting of planning permission and construction of new housing developments, some of which can be unplanned, and from which children will present to the school estate, has an obvious potential impact on the capacities, specifications and implementation of any programme."

30. In conclusion, I find that the indicative time-period of 10-years for retention of contributions to education infrastructure is both commensurate with the anticipated life span of the modified proposed plan and is appropriate for this form of development. In

addition, the policy allows for different time periods to be negotiated with the council, which could be used to reduce the retention period, if justified. Given that flexibility is already built into the policy, I see no compelling reason to alter this.

CI1 Contribution towards Affordable Housing

31. Scottish Planning Policy requires local development plans to clearly set out the scale and distribution of the affordable housing requirement for their area. Paragraph 129 expects that the level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses. This figure is further confirmed in Planning Advice Note (PAN) 2/2010 'Affordable Housing and Housing Land Audits', where paragraph 14 confirms that 25% of the total number of housing units should be the benchmark for affordable housing. It notes that a lower figure can be set locally, if justified by the housing needs and demand assessment (HNDA) and identified in the local housing strategy and development plan.

32. Scottish Planning Policy paragraph 128 requires that "Local development plans should clearly set out the scale and distribution of the affordable housing requirement for their area. Where the HNDA and local housing strategy process identify a shortage of affordable housing, the plan should set out the role that planning will take in addressing this."

33. Clydeplan policy 9, amongst its provisions, requires local authorities to "develop appropriate policy responses where required, including affordable housing, specialist housing and development contributions policies, to deliver housing products taking account of the Housing Need and Demand Assessment (May 2015) as well as local evidence and circumstances". I note also that the all-tenure housing supply targets (in schedule 7 of Clydeplan) and all-tenure housing land requirements (in schedule 8) by local authority consist of both private sector and social sector housing. The social sector equates, in broad terms, to affordable housing, although Clydeplan notes that the social category does not include some private sector affordable products such as shared equity and low-cost home ownership. The figures in Clydeplan schedules 7 and 8 show that social sector housing is anticipated to make up approximately 20% of new homes over the plan period.

34. The council's evidence base in support of its proposed policy on affordable housing contributions is set out in its 'Affordable Housing Policy Background Report' (AD23), which was prepared in 2018.

35. The tenure breakdown in the report shows that only 20% of the stock within the Cumbernauld housing sub-market area is social rented, compared to 33-35% in the other housing sub-market areas within North Lanarkshire. Whilst pressure on social housing appears to have decreased across North Lanarkshire as a whole, the Cumbernauld housing sub-market area is identified as continuing to show relatively greater pressure than all local housing market areas in North Lanarkshire. The report attributes the observed reduction in pressure, in part, to be a result of the council's new-build programme, which, together with the affordable housing contributions required by policy in the Cumbernauld housing sub-market area, has increased the supply of affordable housing across the area. For these reasons, the council proposes that there is a strong case for continuation of the affordable housing policy within the Cumbernauld housing sub-market area.

36. Analysis of the 2015 HNDA within the report indicates a requirement for an additional 162 new affordable units per annum on average, to meet housing need. Table 13 of the report summarises the effective housing land supply for the period 2016 – 2021 and presents figures for the number of affordable units that would be generated by a 20% or 25% contribution. Given the time that has elapsed since the Affordable Housing Policy Background Report was produced, I issued a further information request, asking the council to provide an update to table 13 and hence an update to its justification for the proposed 20% contribution.

37. The council's revised table 13, which is based on the 2019 housing land audit and the current strategic housing investment plan 2021/22 – 2025/26 is set out below.

Table 13: Effective Land Supply 2021-2026 (based on HLA 2019)		
	2021-26	**Average Annual**
Total Effective Land Supply (CN)*	3,105	621
Total Effective Land Supply identified in Strategic Housing Investment Plan (SHIP) 2021/22 – 2025/26	501	100
Total Effective Land Supply less Social Rent Units identified in the SHIP 2021/22	2,604	521
25% Developer Contribution	651	130
20% Developer Contribution	521	104
Total Potential Social Rented Units – SHIP plus Developer Contribution @ 25%	1,152	230
Total Potential Social Rented Units – SHIP plus Developer Contribution @ 20%	1,022	204

*CN – Cumbernauld Housing Sub-Market Area

38. In its response, the council has confirmed that the assumed percentage contribution towards the provision of affordable housing in the Cumbernauld housing sub-market area in the 2019 housing land audit depends on the status of the relevant site(s) within the modified proposed plan. The programmed supply (by tenure) in the 2019 housing land audit is based on an assumed 25% contribution towards affordable housing for existing housing development sites and 20% for new housing development sites in the modified proposed plan. The only exception to this is where a site-specific agreement has been reached between the council and the developer. Where this is the case, the site-specific contribution is used in programming figures for applicable site(s) to provide a more accurate reflection of future output on those sites.

39. The revised table 13 above summarises the effective land supply for the period 2021 – 2026 and presents figures for the total potential number of affordable units that would be generated by a 20% or 25% developer contribution. This shows that a 25% developer contribution would generate 230 affordable units per annum, whilst a 20% contribution would generate 204 affordable units per annum. Even at the 20% level, the anticipated number of affordable units comfortably exceeds the predicted annualised need of 162 units per annum.

40. Based on completions data provided by the council, this indicates that there is currently a modest backlog in meeting the annualised need of 162 affordable homes per annum in the Cumbernauld housing sub-market area. This is based on completion data for each affordable home for which grant funding has been claimed under the Scottish Government's housing and regeneration programme. The dataset covers all forms of affordable housing including empty house purchase, off-shelf purchase and buy-back

from existing stock, in addition to new build captured by the housing land audit. The council states that the returns show that 755 affordable homes were provided in the Cumbernauld housing sub-market area between 2015/16 and 2019/20.

41. The council has stated that the provision of 755 affordable homes equates to an average of 131 per year (compared to the need of 162 affordable homes), which has resulted in an annualised five-year backlog need of 31 new homes per year. However, by my calculations, delivery of 755 homes over a five-year period would equate to an average of 151 homes per year and hence the shortfall would only be an annualised average of 11 affordable homes per year.

42. Thus, even if allowance is made for this modest backlog in delivery of affordable homes, the total potential social rented units that would be generated under a 20% contribution, would still exceed the estimated need of 162 units.

43. I am further encouraged in accepting the council's proposed 20% contribution by review of the data that the council has supplied from the Common Housing Register (often referred to as the 'waiting list') and homelessness declaration applications. Over the revised table 13 period, it has seen a moderate, 16% decline in Common Housing Register applications and a significant 29% drop in homelessness applications in the Cumbernauld housing sub-market area since 2015.

44. In addition, I note the findings in relation to housing land supply situation relative to the residual housing land requirements, addressed under issue 4 of this examination. That has shown that there is a sufficiently generous housing land supply within the Cumbernauld housing sub-market area. This provides me with added confidence that the anticipated levels of affordable housing contributions are capable of being delivered.

45. All told, I find that the council has set out a clear evidence base for the continuing need for an affordable housing contribution within the Cumbernauld housing sub-market area. It has provided evidence of its position that the current affordable housing contribution has been effective in increasing the supply of affordable housing and reducing pressure on the housing market. However, further contributions are required and based on the evidence before me, I consider that a 20% contribution is now appropriate and justified.

46. Scottish Planning Policy paragraph 129 states that "The level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses." It does not preclude councils from setting a requirement for a smaller percentage contribution. Indeed in two of North Lanarkshire's three housing sub-market areas, there is no policy requirement for any affordable housing contributions at all.

47. Based on the foregoing, no modifications are required.

<u>Location of provision of affordable housing</u>

48. The objection from the Northern Corridor Community Volunteers (185) is concerned that commuted sums for affordable housing are not being used to benefit local residents in Moodiesburn and the Northern Corridor, but are being used to build affordable homes in Cumbernauld.

49. PAN 2/2010 Affordable Housing and Housing Land Audits sets out guidance as to the delivery of affordable housing. Ideally this should be integrated into the proposed development and wider community. However, in the exceptional circumstances illustrated in paragraph 21 of the guidance, where a site may be unsuitable for affordable housing, developers may provide the contribution on another viable site within their ownership. Alternatively, a developer may provide a commuted sum, "as long as the proposed alternative will help to meet an identified need in the same housing market area."

50. As the Northern Corridor Area Partnership and the Cumbernauld and Kilsyth Area Partnership both fall within the Cumbernauld sub-market housing area, I see no policy barrier to commuted sums being used to provide affordable housing within another part of the same housing sub-market area. The concerns raised are not therefore matters which require a different policy response by the modified proposed plan. No modification is required.

Areas to which the affordable housing contribution applies

51. I find that the council's responses to representations set out above, concerning the geographic application of the affordable housing contribution to be inconsistent with how the policy approach has otherwise been articulated.

52. In response to the suggestion that the policy should be applied across all housing sub-market areas, the council has stated that it "…considers that the wording of the Policy allows for the provision of affordable housing across the wider local authority area to be required on a case-by-case basis, as and when a need has been identified." This seems to contradict its view that "The Council considers that the wording is clear that Cumbernauld Housing Sub-Market Area is the only part of North Lanarkshire where affordable housing will be sought, and that this will be applied on a case-by-case basis."

53. In order to clarify the intention of this policy, I sought further information from the council.

54. The council has confirmed that "the Affordable Housing Policy is a fully justified obligation to private developers in the Cumbernauld Housing Sub-Market Area, but that this cannot be imposed or insisted upon elsewhere without agreement, unless there is justification, which is a complex mix of economic and social indicators and the pressure for social housing." It has further confirmed that the policy is designed to provide flexibility, in the light of changing circumstances, to allow for affordable housing requirements to be imposed elsewhere, without waiting 10 years for a new plan to be prepared and adopted.

55. As discussed above, the Affordable Housing Policy Background Report (AD47) sets out the need for an affordable housing policy within the Cumbernauld housing sub-market area. This requirement is stated in the introductory text to the promoting & protecting policies on page 25 of the modified proposed plan. Policy CI clearly states that the policy covers affordable housing in the Cumbernauld housing sub-market area, making a distinction to the requirements for other infrastructure, which are to be considered across North Lanarkshire.

56. Nevertheless, the detailed wording for Category CI1 Affordable Housing lacks clarity. It states that the requirement will be considered on a case-by-case basis, before going on

to confirm that proposed residential developments in the Cumbernauld housing sub-market area will require affordable housing provision at the specified rate.

57. Based on the supporting documents in relation to affordable housing, supporting text within the modified proposed plan, and the council's clarifications, I conclude that the key intention of the policy is to secure affordable housing within the Cumbernauld housing sub-market area to address the pressure on this housing tenure that has been identified. However, I understand the reasons why the council may wish to retain some flexibility for the future, in terms of being able to encourage or allow for contributions towards affordable housing elsewhere in North Lanarkshire. As currently drafted, the wording of the policy is ambiguous. I have therefore proposed a modification to the wording to clarify the council's stated aims of the policy.

Implications of policy for site effectiveness

58. Some representations consider that there is a perceived shortfall in housing land supply and are concerned that this could be exacerbated if requirements for infrastructure result in more allocated sites becoming non-effective.

59. The adequacy of the housing land supply has been addressed under issue 4.

60. Scottish Planning Policy allows for local authorities to require developer contributions to infrastructure. Policy CI sets out the circumstances when such contributions will be required. Whilst I note the concerns about the potential effects of the requirements on the effectiveness of sites, I have not been provided with any evidence of examples of where this may be the case. Furthermore, none of the matters within the scope of the policy and for which contributions may be sought are unusual or onerous, and I cannot see why such contributions should be expected to constrain some sites.

Application to publicly funded bodies

61. The purpose of the policy is to seek contributions which, individually or cumulatively, generate a requirement for new or enhanced infrastructure or services. That need can as easily arise as a result of developments funded and promoted by public sector bodies as those promoted by private sector enterprises. There may be substantial public benefits from enhanced rail infrastructure, but these could bring with them requirements to improve non-rail supporting infrastructure.

62. The policy provides flexibility, recognising that contributions will not be required in all cases. Circular 3/2012 Planning Obligations and Good Neighbour Agreements sets the six 'tests' for use of obligations. I am content that the wording of the policy as it applies to transport improvements is consistent with those requirements. I therefore see no need to modify the wording of the policy.

Reporter's recommendations:

1. On page 12, the box in the first column under the heading 'Guidance' should be modified by adding the following words in parenthesis after 'Contributions to Infrastructure':

"Statutory Supplementary Guidance will be prepared to set out the framework of the application of the Policy, identification of need, calculation of contributions and methods

of collection and management of funds. This will be subject to public consultation and submission to Ministers prior to adoption."

2. On page 136, in Section headed 'CI Contributions to Infrastructure Policy', in the column headed 'Status' delete the second paragraph ("Supplementary Planning Guidance …. Management of funds.") and replace with:

"Statutory Supplementary Guidance will be prepared to set out the framework of the application of the Policy, identification of need, calculation of contributions and methods of collection and management of funds. This will be subject to public consultation and submission to Ministers prior to adoption."

3. In the table headed 'Contributions to Infrastructure Policy Categories and Guidance' on pages 80 – 81 of the modified proposed plan, in the first column, change the title of each from "Category CI1….." to "Policy CI1 category ….."

<u>CI2 Education</u>

4. On page 80, within the text box supporting 'Category CI2 Education', the second paragraph should be modified as follows:

Delete the first sentence: "A contribution towards education…..one bedroom."

Insert a new first sentence: "The Council will consider the requirement for contributions towards educational infrastructure for all new residential development proposals resulting in 5 or more dwellings, on a case-by-case basis, where an identified need has been demonstrated."

<u>Areas to which the affordable housing contribution applies</u>

5. On page 80 of the modified proposed plan, in the box explaining the application of Category CI1 Affordable Housing, delete the start of the first sentence, from "The Council .." up to and including "however".

The wording in this box should therefore read:

"For proposed residential developments in the Cumbernauld Housing Sub-Market Area (as shown on Page 82 of the Policy Document) the Council seeks to secure 20% affordable housing provision in continuation of adopted Council Policy on the advice of the Council's Housing Strategy Service. Justification is contained in the **Affordable Housing Policy Background Report**. Further Guidance is contained in the **Council's Affordable Housing Guidance**.

6. A new paragraph should be added after the first paragraph:
   "The Council will consider the requirement for the provision of affordable housing elsewhere on a case-by-case basis, where an identified need has been demonstrated."

Issue 022	**Site Appraisal**	
Development plan reference:	Environmental & Design Qualities Policy EDQ1 Pages 84 - 85	**Reporter:** Sue Bell
Body or person(s) submitting a representation raising the issue (including reference number):		
Ogilvie Homes (188) Scottish Government (255) Scottish Natural Heritage (SNH) (272)		
Provision of the Development Plan to which the issue relates:	Placemaking Policies – Environmental and Design Qualities EDQ 1 Policy Site Appraisal Any proposed development will require to be appraised in terms of the site and its surroundings to ensure it will integrate successfully into the local area and avoid harm to neighbouring amenity EDQ 1 Guidance Applications will require to be accompanied by an appraisal of the site and its surrounding Land Use Character Area. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		

Ogilvie Homes (188.235) and supporting documents RD018-RD026, Ogilvie Homes (188.237) and supporting documents RD027-RD033 and Ogilvie Homes (188.238) and supporting documents RD034-RD040, object to omission of CfS/MIR Sites 0009/02 (NLLDPP Site 09/02F) Westerwood Golf Club, Cumbernauld (SM031), 0007/02 Site A Dunning Drive, Cumbernauld (SM32) and 0008/02 Site B Dunning Drive, Cumbernauld (SM033) on basis that as evidenced in an indicative layout and access plan attached to the representation (188.235), the development of the sites can be designed in such a way as to meet the criteria as set out in Policy EDQ 1.

Scottish Government (255) objects to Policy EDQ 1's, 19th matter to be addressed in a non-exhaustive list of requirements "the potential for installation and operation of low and zero-carbon generating technologies in new, refurbished or re-purposed buildings". As written, the Policy does not meet the Town and Country Planning (Scotland) Act 1997 (AD66) Section 3F, which requires policies to specify a proportion of greenhouse gas emissions to be saved through the use of the technology, and for that proportion to rise.

SNH (272) objects to Policy EDQ 1 on the grounds that there are no clear site requirements contained in the Plan for key site allocations.

On page 83, reference is made under Site Appraisal to 'Land Use Character Areas' and on page 84 to "landscape character" and "land use character area" within bullet 11. The use of the term "character area" in the context of site appraisal is likely to be confusing as this term is more readily recognised in the context of Landscape Character Assessment.

Modifications sought by those submitting representations:

Ogilvie Homes (188.235), (188.237) and (188.238) offer no proposed modifications, resting on demonstrating that the sites are effective and appropriate for allocation as Proposed Housing Development Sites.

Scottish Government (255) seeks the updating of the Policy to meet the requirements of Section 3F of the Town and Country Planning (Scotland) Act 1997.

SNH (272) seeks the provision of certainty and the securing of a design-led approach from the outset through the inclusion of clear requirements for key site allocations, including those for the protection and enhancement of landscape and other natural heritage assets. In addition, SNH (264) seeks the replacement of the term "Land Use Character Area" with "land use zones" to ensure a clearer distinction between these and "landscape character areas".

Summary of response by planning authority:

Ogilvie Homes (188.235), (188.237) and (188.238) - The matters raised do not appear to be objections to Policy EDQ 1 and its stated non-exhaustive list of matters to be addressed in the determination of any applications for planning permission and no modifications to the wording are sought. Rather, the objections seek to demonstrate that the housing sites being promoted meet those criteria and should be allocated as Proposed Housing Development Sites accordingly. The principle reasons for the sites' non-inclusion remain sufficiency of supply and the setting of the housing in that locality and are dealt with under Issue 04 PROM LOC 3 Housing Development Sites and Issue 29 Cumbernauld & Kilsyth Local Area Partnership.

Scottish Government (255) - North Lanarkshire Council Carbon Management Plan 2019-2022 (AD48) sets a Council target of a 9% reduction in carbon emissions to be achieved by 2019 using the 2015/16 carbon footprint as the new baseline for the reduction of this towards the achievement of Zero Net Carbon by 2030.

Should the Reporter find it acceptable, the Council proposes the expansion of the 19th matter, so that it reads "the potential for installation and operation of low and zero-carbon generating technologies in new, refurbished or re-purposed buildings in order to achieve the Council's initial 9% reduction in carbon emissions, with a view to achieving 0% net carbon."

SNH (272) - High level requirements to be addressed in implementing individual proposed development allocations through the Development Management process are contained in the Action Programme (AD18) that accompanies the Local Development Plan. The Council does not agree that these should be listed within the Policy Document.

The Council disagrees with the comments that "Land Use Character Areas" are likely to be confusing and does not feel it appropriate to give some form of special protection to the term "Character Areas". It is the character areas that are the essence and concept of the Plan's place making focus, not the individual designations, or the more commonly associated with North American planning term zoning *per se*. The predominance, or mixture of land uses convey the overall character of an area, hence the wording "Character Area". It is noted that Landscape Character Area is terminology used by Scottish Natural Heritage, but the Council does not agree that the wording ''land use

character areas" should be changed to "land use zones".

Reporter's conclusions:

Westerwood Golf Club,Cumbernauld (CfS/MIR Site 0009/02; NLLDPP Site 09/02F); Site A Dunning Drive, Cumbernauld (0007/02; SM032); and Site B Dunning Drive, Cumbernauld (0008/02; SM033)

1. All representations which relate to the site at Westerwood Golf Club, and Sites A and B Dunning Drive, are addressed as part of issue 16.

2. I agree with the council that these representations do not directly relate to the provisions of policy EDQ 1, but raise site-specific matters and in doing so seek to draw support / show compliance with the provisions of policy EDQ 1.

Criterion for low and zero-carbon generating technologies

3. Policy EDQ 1 requires any proposed development to be appraised in terms of the site and its surroundings. A list of the matters that need to be addressed in such appraisals is included within the policy. Whilst this contains 20 items, the list is not intended as exhaustive and additional items may need to be assessed. Item 19 on the list relates to low and zero-carbon generating technologies.

4. Section 3F of the Town and Country Planning (Scotland) Act 1997 (as amended) sets out that local development plans should include policies requiring all developments in the local development plan area to be designed so as to ensure that all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions from their use, calculated on the basis of the approved design and plans for the specific development, through the installation and operation of low and zero-carbon generating technologies.

5. As currently worded, Policy EDQ 1 requires an appraisal of the potential for installation of low and zero-carbon generating technologies in new, refurbished or re-purposed buildings. However, it does not set thresholds or targets in terms of the proportion of greenhouse gas emissions that should be saved through the use of the technology.

6. I find the council's proposed modification to the policy (set out above) to be unsatisfactory on a number of counts. It does not appear to meet the requirements of the Act, as the proposed target for reduction is not directly linked to the projected greenhouse gas emissions from the use of the property; and the target does not provide for a rising proportional reduction in projected greenhouse gas emissions. In addition, the source and relevance of the council's proposed 9% target is unclear and, in any case, has not been adjusted to take account of the lifespan of the modified proposed plan. In light of these concerns, I sought further information from the council on how the policy was considered to comply with Section 3F of the Town and Country Planning (Scotland) Act 1997 (as amended).

7. In its detailed response to my further information request, the council has confirmed that the requirements of policies EDQ 1 Site Appraisal and EDQ 3 Quality of Development must be read in conjunction with each other. It stresses that policy EDQ 1 is primarily concerned with the existing features of a site and how it relates to its surroundings, whilst policy EDQ 3 requires consideration of the design of a new

development. Accordingly, it proposes that the points raised in the representation from the Scottish Government (255) would best be addressed through a modification to policy EDQ 3, rather than policy EDQ 1.

8. In relation to the specific requirements set by the Act, the council has confirmed that following its declaration of a climate emergency, it is exploring revised methods and baselines to achieve net zero carbon. Consequently, it is not in a position to propose a revised baseline to support its previously suggested amendment during consideration of the proposed plan and wishes to withdraw the targets it proposed in response to the representation. It has, however, proposed including the targets set within Building Standards Technical Handbook within policy EDQ 3.

9. Having considered the council's additional response and clarification of the respective purposes of policies EDQ 1 and EDQ 3, I accept that targets for reduction in carbon generation would best be placed within the policy which deals with the quality of a proposed development (i.e. Policy EDQ 3). I note that part (c) of that policy specifically addresses mitigation of and adaptation for the effects of climate change.

10. It is regrettable that the council is not in a position to establish specific reduction targets for new development. Nevertheless, I am content that linking the policy to national standards and targets would be consistent with the requirements of section 3F of the Town and Country Planning (Scotland) Act 1997.

11. Notwithstanding my comments above, I do not consider it necessary to remove the 19th bullet point from the list set out under Policy EDQ 1. The requirement to consider the potential for installation and operation of low and zero-carbon generating technologies remains a valid component of site appraisal and would be supported by the detailed design criteria set out in policy EDQ 3.

12. I therefore conclude that whilst no modification to policy EDQ 1 is necessary, a modification is required to policy EDQ 3 in respect of establishing targets for reducing greenhouse gas emissions. Further details of the modification required to policy EDQ 3 are set out under issue 24.

Individual site requirements

13. Setting out site specific requirements is helpful in alerting potential developers to particular constraints or site characteristics that need to be incorporated into the design.

14. The action programme (AD18) provides site-specific information for each of the sites allocated through the proposed plan. This includes details of any site constraints; specific requirements or actions required for each site; identification of who is responsible for delivering the specific requirements and timescales for these.

15. I find that the information within the action programme encompasses the concerns raised by Scottish Natural Heritage (now NatureScot), in setting out clear requirements for site allocations, including those for the protection and enhancement of landscape and other natural heritage assets. Therefore, no modification to the policy is necessary.

Use of term "Character Area" in context of site appraisal

16. Placemaking forms one of the principal policies set out in Scottish Planning Policy.

It is described as "a creative, collaborative process that includes design, development, renewal or regeneration of our urban or rural built environments." To assist in achieving placemaking, Scottish Planning Policy refers to "harnessing the distinct characteristics and strengths of each place to improve the overall quality of life for people."

17. The spatial strategy of the modified proposed plan has an important role in placemaking, through directing the right type of development to the right places. It is common to differentiate policy requirements based on an area's particular needs or characteristics. Areas where there are similar policy requirements have been referred to in the modified proposed plan as 'Land Use Character Areas'. The term is defined within the glossary of the modified proposed plan as: "areas identified in the Local Development Plan Principal Policy, the purpose of which is defined by the range of uses found in that place, or the range of main and supporting or ancillary uses the Council would like to encourage."

18. I acknowledge that the term 'character area' is often used in connection with landscape character assessment, which is a widely recognised and standardised tool for identifying, characterising and describing areas of landscape. Nevertheless, the concept of the 'character' of an area or building is also used more widely. For example, to refer to the character of a listed building or conservation area; or the character of a settlement. Thus, the term "character area" is not exclusive to landscape assessment.

19. The representation does not dispute the concept of defining 'land use character areas'. I am not aware of any standardised terminology for defining different areas within a local development plan. Therefore, the naming of these areas is at the discretion of each council. I accept that there is a superficial similarity between the terms 'land use character area' and 'landscape character area'. Nevertheless, the terms are different and the proposed plan provides a clear definition of 'land use character area.' Consequently, I conclude there the term does not require to be modified.

Reporter's recommendations:

No modifications required.

Issue 023	**Special Features for Consideration**	
Development plan reference:	Environmental & Design Qualities Policy EDQ 2 Page 86	**Reporter:** Sue Bell
Body or person(s) submitting a representation raising the issue (including reference number):		
Wallace Land Investments (219) Wallace Land Investments (220) Trustees of Miss I D Meiklam (262) Homes for Scotland (266) EPC-UK Plc (267) Scottish Environmental Protection Agency (SEPA) (273) Scottish Power (275) Coatbridge LVA LLP (276)		
Provision of the Development Plan to which the issue relates:	Placemaking Policies – Environmental and Design Qualities EDQ 2 Policy Special Features for Consideration North Lanarkshire Council will consider development in areas subject to hazards and other special features in accordance with plans and protocols of the relevant management agencies. EDQ 2 Categories and Guidance Applications will be expected to be accompanied by an assessment of how constraints affect sites dependant on characteristics, surroundings and development form. 2A Hazardous Zones, 2B Utilities Infrastructure, and 2C Management Areas All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		
Wallace Land Investments (219) and supporting documents RD128-RD135 and (220) and supporting documents RD136-RD143, (On the Rep form this objection is under EDQ3, however relates to EDQ2) and supporting documents RD136-RD145 , Trustees of Miss I D Meiklam (262) and supporting document RD227, Homes for Scotland (266) and supporting documents RD235-RD237, Scottish Power (275) and supporting document RD241 and Coatbridge LVA LLP (276) and supporting document 241 object to Category EDQ 2C Management Areas on the grounds that the emerging Local Development Plan refers developers to the guidance "Noise Guidance for New Developments" (AD52), rather than outlining noise policy in the Policy Document. The Council's Guidance is more onerous than Scottish Government's Planning Advice Note 1/2011 (AD63), particularly regarding the approach taken to noise levels with open/closed windows, and should not be regarded as formal Supplementary Guidance, as it has not be subject to any form of open and transparent consultation. The manner in which guidance is being interpreted by Officers has led to recommendations to refuse planning permission on allocated brownfield housing sites on noise grounds alone. This approach will inhibit the development of allocated sites and have a negative impact on the 5-year Effective Housing Land Supply, which is already in		

shortfall. The North Lanarkshire Noise Guidance shares wording and terminology with the Royal Environmental Health Institute of Scotland (REHIS) Briefing Note, but is not acknowledged in the guidance and has no formal status.

EPC-UK Plc (267) objects to the lack of sufficient regard to the need to protect existing hazardous substances sites from unsuitable encroachment, as well as the need to protect local communities. The provision of a specific planning policy is needed to protect such operations from inappropriate development within Health and Safety Executive consultation zones and the associated "consultation zones" should be identified in the relevant map books.

SEPA (273) objects to the lack of emphasis on why flood risk is a constraint to development. The avoidance principle should be at the forefront of this approach. With regard to air quality, the Plan should acknowledge and take account of existing air quality issues when promoting allocations, particularly in respect of proximity to SEPA regulated facilities.

Modifications sought by those submitting representations:

Wallace Land Investments (219) and (220), Trustees of Miss I D Meiklam (262), Homes for Scotland (266), Scottish Power (275) and Coatbridge LVA LLP (276) seek a more flexible approach to noise targets in Noise Guidance for New Developments and conformity with Planning Advice Note 1/2011 (AD63) and Technical Advice Note.

Noise Guidance for New Developments should not be given any material weight in determining planning applications until it is the subject of appropriate consultation and a formal approval process. Furthermore, the emerging Noise Guidance and Policy EDQ 2 should explicitly state that acceptable noise levels can be achieved by appropriate mitigation measures, if required. Reference to "exceptional" circumstances in any supplementary guidance note should be deleted.

EPC-UK Plc (267) seeks a site-specific policy for the Portcullis Estate similar to wording used for the operator's site in Harwich by Tendring District Council. Requests that the Council considers adding some enabling aspects to the Policy to allow improvements or development on the Portcullis Estate site to support the existing business where required in the future and suggests wording used by Tendring District Council, Essex, for its site in Harwich, Essex.

SEPA (273)

1. Flood risk:

- seeks the inclusion of a sentence to ensure development is avoided in areas at medium to high flood risk from any source, unless it accords with SPP Framework.
- recommends that the risk framework set out in SPP paragraph (AD260) 263 should be applied and supplemented by the context of the issues listed in SPP (AD260) paragraph 264 of in conjunction with SEPA's Land Use Vulnerability Guidance.
- strongly emphasises that a precautionary approach is taken to flood risk from all sources taking account of the predicted impacts of climate change.
- seeks to ensure that site allocations where a potential flood risk has been identified have site requirements for a Flood Risk Assessment. This should link to the information provided by SEPA at the "Call for Sites" stage of the process and the

SEA Site Sustainability Report undertaken by NLC.

- seeks the addition of text to the Policy, which confirms that a precautionary approach will be taken to proposed allocations in areas protected by a flood protection scheme. This should include a framework explaining what types of development will not be allowed.

2. Air quality:

- emphasises the need to ensure that sites are not allocated for land uses that would require regulation by SEPA, where they are unlikely to be authorised due to an inability to mitigate risks arising from the location of the development (co-location). This applies to industry and residential as locating new sites of either use adjacent to existing sites can directly impact on the consequences/impacts for the other.

Summary of response by planning authority:

Wallace Land Investments (219) and (220), Trustees of Miss I D Meiklam (262), Homes for Scotland (266), Scottish Power (275) and Coatbridge LVA LLP (276) - The North Lanarkshire Council "Noise Guidance for New Developments" (NGND) (AD52) is not Supplementary Guidance. However, Supplementary Guidance on this matter is currently being developed by the Council, and in its absence developers are being directed towards "Noise Guidance for New Developments" in the meantime to cover all sites identified or not. This guidance will be developed in line with the most up to date legislation and guidance and will be applied to historic and future sites. It will also be subject to the full statutory consultation process before it is adopted as Supplementary Guidance.

The wording of the Policy is clear that "Only in exceptional circumstances should satisfactory internal noise levels only be achievable with windows closed and other means of ventilation provided" and "for the purposes of this guidance exceptional circumstances are considered to be proposals which aim to promote sustainable development and transport within the Local Authority area and which would provide benefits such as: (a) reducing urban sprawl (b) reducing uptake of greenfield sites (c) promoting higher levels of density near transport hubs, town and local centres (d) meeting specific needs identified in the local development plan.

Exceptional circumstances will, therefore, generally apply only to sites that are small to medium in scale, within urban areas. This may include sites in established residential areas; brownfield sites; town and village centres, and sites near public transport hubs".

The Council stresses that it is for each individual local authority to prepare its own guidance and to encourage high quality development in line with good place making standards. The Council therefore does not agree that it is unreasonable for the applicant to demonstrate exception and this will be assessed through the development management process on a case by case basis.

Matters raised regarding a perceived Housing Land Supply shortfall are addressed under Issue 04 PROM LOC 3 Housing Development Sites.

EPC-UK Plc (267) - In the North Lanarkshire Local Plan Report of Examination 2012 (AD53 &AD54), the Reporter found it unnecessary to delineate hazardous consultation zones on the Local Plan Proposals Map, and that there is no requirement for planning

authorities to do so. The Council is continuing to abide with that Recommendation.

Policy EDQ 1 Site Appraisal will ensure the appropriateness of the type of development is considered and Policy EDQ 2 Specific Features for Consideration will ensure that development in areas subject to hazards (Hazardous Zones) are considered in accordance with plans and protocols of the relevant managing agencies. In essence, the EDQ Policies require all proposals to demonstrate to the Council's satisfaction that there will be no adverse impacts, so the Council does not agree that a site specific policy is required. In addition, the Health and Safety Executive (HSE) is a statutory consultee for certain developments within Consultation Distance of Major Hazard Sites/Pipelines and would be consulted directly as part of the Development Management process.

Should the Reporter find it acceptable, the Council proposes the expansion of Category EDQ2A Hazardous Zones, so that it reads

"HSE Hazard Consultation Zones The Health and Safety Executive will be consulted directly as part of the Development Management process for proposed developments within whatever relevant consultation distance of Major Hazard Sites/Pipelines applies at the time the application is made.
These are neither listed, nor mapped".

SEPA (273)

Flood risk - The Council considers that the Policy is explicit that in flood risk areas the Flood Risk Framework will be implemented as set out in SPP and that SEPA Flood Maps can be used to identify areas of risk to help ensure a precautionary approach is taken. The Action Programme (AD18) lists all of the Proposed Development Sites in the Local Development Plan and their specific site requirements to be addressed, including Flood Risk Assessment and areas protected by a Flood Prevention Scheme. SEPA is a statutory consultee and would be consulted directly as part of the Development Management process.

Air quality - The Council maintains that all of the sites allocated as Proposed Development Sites have been appropriately identified for development in principle and will be subject to assessment against relevant legislation and all other Policies in the Plan. Air Quality is given its own category EDQ 2C and the Council's designated Air Quality Management Areas are shown on the Map Book Protect Maps. The Action Programme (AD18) lists all of the Proposed Development Sites in the Local Development Plan and their specific site requirements to be addressed, including those affected by Air Quality Management Areas. SEPA is a statutory consultee and would be consulted directly as part of the Development Management process.

Reporter's conclusions:

Category EDQ 2A Hazardous Zones: Flood Risk

1. Paragraphs 254 – 268 of Scottish Planning Policy set out the Scottish Government's approach to managing flood risk and drainage. Four principles are listed in paragraph 255. This requires the planning system to promote: a precautionary approach to flood risk from all sources; flood avoidance; flood reduction; and avoidance of

increased surface water flooding.

2. Paragraph 263 sets out three categories of flood risk and identifies the types of development that may be suitable in such areas. Similar guidance is also provided for areas subject to surface water flooding. In all cases, as paragraph 264 sets out, a number of site-specific factors would also need to be considered, in determining the likelihood of a flood risk and hence the acceptability of an individual development.

3. The representation seeks the text relating to flood risk within Category EDQ 2A Hazardous Zones, to reiterate some of the requirements stated in Scottish Planning Policy. However, there is no obligation or requirement on planning authorities to repeat Scottish Planning Policy verbatim within their development plans.

4. Whilst I accept that the guidance within the modified proposed plan does not specifically state that development should be avoided in areas at medium to high flood risk from any source, it does explicitly refer to the flood risk framework set out in Scottish Planning Policy as one of the plans and protocols in accordance with which, development will be managed.

5. The issues listed in paragraph 264 of Scottish Planning Policy relate to site specific aspects that should be taken into account when applying the flood risk framework. Again, whilst these are not listed specifically within policy EDQ 2A, they are related to the flood risk framework, which is directly referenced in the modified proposed plan. As SEPA is a statutory consultee it would have the opportunity to ensure that these pertinent aspects have been fully considered in any application.

6. The current text within policy EDQ 2A refers to the need to take a precautionary approach to flood risk, but it does not make explicit reference to the effects of climate change on flood risk. The importance of planning for the effects of climate change is recognised within criterion c of policy EDQ 3 'Quality of development' within the modified proposed plan. However, that relates to effects of climate change generally and is not explicit in referring to flood risk. I have commented on this point as part of my conclusions in relation to Issue 24.

7. Given the importance of planning for climate change in relation to flooding, which is encapsulated within the policy principles established in paragraph 255 of Scottish Planning Policy and SEPA's concerns on this issue, I consider that the wording of the guidance within the modified proposed plan should be strengthened to reflect the link between climate change and flood risk. This can be achieved by adding reference to the effects of climate change at the end of the penultimate sentence of the first paragraph in column 2 of category EDQ 2A 'Hazardous Zones'.

8. Scottish Planning Policy acknowledges the need to consider the characteristics of individual sites in applying the flood risk framework. The representation suggests that the requirements for flood risk assessments should be identified for allocations where a potential flood risk has been identified. I consider that this suggestion is already met in the Action Programme, which identifies those sites for which a flood risk assessment will be required.

9. Flood protection schemes can reduce flood risk, but they cannot be expected to completely remove any risk. For this reason, SEPA states that it does not take into account any protection offered by informal flood defences. Applications would be

assessed on the basis of the flood risk, should the informal defence not exist. Whilst the Action Programme makes reference to flood risk at individual sites, I can find no specific reference to areas protected by a flood prevention scheme, as suggested by the council in its response. SEPA does not appear to have objected on flood risk grounds to any individual allocation within the modified proposed plan. Together, these points lead me to conclude that sites where flood risk may be an issue have been identified and that the acceptability of allocations are not reliant upon any existing flood prevention measures that may be in place.

10. Nevertheless, the wording of the policy guidance (and noting that in issue 1 we have recommended 'policy' and 'guidance' be combined, to become policy) clearly identifies that a precautionary approach will be taken to flood risk from all sources. Whilst it does not specifically state that it would also apply to sites where there may be existing informal flood prevention measures, neither does it state that such areas would be precluded. Indeed, to do so would be counter to the principles encapsulated within the precautionary principle.

11. Bringing these points together; the policy states that the flood risk framework set out in Scottish Planning Policy will be applied and that decisions will be in accordance with plans and protocols of the relevant managing agencies. SEPA constitutes one of these managing agencies and is a statutory consultee. It has a clear policy that flood risk will be assessed in the absence of any protection from existing informal flood defences. As a statutory consultee it is in a position to ensure that these aspects have been properly applied and assessed appropriately. I therefore conclude that the aspects highlighted by SEPA are accounted for within the policy and that no modification is required.

<u>Category EDQ 2A Hazardous Zones: Hazardous substances sites</u>

12. The representation seeks to safeguard protection for hazardous substances sites through a site-specific policy, which would also enable future development.

13. The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015 (the 2015 Hazardous Substances Regulations) made amendments to the Town and Country (Development Planning) (Scotland) Regulations 2009, to allow implementation of directive 2012/18/EU on the control of major-accident hazards involving dangerous substances. The effects of these changes are set out in planning circular 3/2015 'Planning Controls for Hazardous Substances'.

14. Paragraph A3 of the circular sets out those matters that must be taken into account by planning authorities when preparing local development plans. They include (amongst other matters) the need, in the long term:

- to maintain appropriate safety distances between establishments covered by the Directive and residential areas, buildings and areas of public use, recreational areas and, as far as possible, major transport routes;
- to protect areas of particular natural sensitivity or interest in the vicinity of establishments, where appropriate through appropriate safety distances or other relevant measures; and
- in the case of existing establishments, to take additional technical measures in accordance with article 5 of the directive so as not to increase the risks to human health and the environment.

15. To assist in identifying appropriate safe distances, the Health and Safety Executive defines 'consultation distances' around major hazard sites and notifies planning authorities of these.

16. Regulation 25 of the Town and County Planning (Development Management Procedures) (Scotland) Regulations 2013 sets out that certain key bodies must be consulted by the planning authority before making a decision whether or not to approve an application for development. These key bodies and the circumstances in which each should be consulted are set out in schedule 5 of the regulations. The Health and Safety Executive is a statutory consultee under the circumstances listed in paragraphs 3 and 4 of schedule 5.

17. Paragraph 3 relates to certain types and scales of proposed development within the 'consultation zones' identified by the Health and Safety Executive and notified to the planning authority.

18. Paragraph 4 relates to:

(a) the siting of new establishments;
(b) modifications to existing establishments which could have significant repercussions on major accident hazards; or
(c) development which includes transport routes, locations of public use and residential areas in the vicinity of an establishments, where the siting of development is such as to increase the risk or consequences of a major accident.

19. However, the Health and Safety Executive is not the only consultee for those developments that fall within paragraph 4. Scottish Natural Heritage (now NatureScot) and SEPA are also identified as statutory consultees for these types of development. In addition, in the case of developments listed in paragraph 4(c) consultation is required with any person who is, according to the hazardous substances consent register, the person who is in control of the land on which the establishment is located.

20. Constraints on development arising from a range of specific features, including hazardous zones are addressed in the modified proposed plan through policy EDQ 2. The policy refers to decisions being made "in accordance with plans and protocols of relevant managing agencies". However, little detail in relation to hazardous substances sites is included in category EDQ 2A Hazardous Zones, especially when compared against advice for other hazards, such as flood risk. Policy EDQ 1 sets out a range of general features that need to be considered for all developments, but this does not specifically refer to hazardous substances sites.

21. I find that the representor's concerns about safeguarding sites subject to the 2015 Hazardous Substances Regulations are already addressed, to a degree, by the legislation. The presence of hazardous substances sites is a factor that planning authorities are required to take into account when considering applications for development. Proposals within the consultation area for development that is incompatible with such sites is unlikely to be acceptable. As a consequence, there may be limits on the range of suitable uses for land within consultation areas. Thus, it is appropriate that such constraints are highlighted within the modified proposed plan.

22. To clarify the situation in respect of major hazard sites and pipelines and the constraints this may place on land use, the council has proposed an addition to the

explanatory text for category EDQ 2A.

23. Whilst any applications for development will be subject to the statutory requirements set out in the 2015 Hazardous Substances Regulations, I find that the current wording within policy EDQ 2 is unbalanced in terms of the detail provided in relation to each of the hazards set out in policy EDQ 2A. However, I am not persuaded that the proposed wording from the council is sufficient or helpful in clarifying the position. As I noted above, the Health and Safety Executive is a statutory consultee for developments involving hazardous substances, but it is not the only statutory consultee where there are proposals to develop new or modify existing establishments. Thus, whilst I conclude that additional text should be added to category EDQ 2A Hazardous Zones, I find that this should recognise the wider statutory position in relation to hazardous substances sites. My proposed wording is set out below.

24. I have considered the request for the addition of a site-specific policy, but I have not been provided with any compelling evidence as to why the activities at the named site should be treated any differently to any other development site within North Lanarkshire. Proposals for development within the site would be subject to the EDQ policies and other policies within the modified proposed plan, in the same way as any other development.

25. The site in question is a hazardous substances site, which would also be subject to the statutory requirements set out above and the modified policy requirements within category EDQ 2A. These measures would act to safeguard the site from inappropriate development within the consultation area, which could affect its ability to operate. In addition, the 2015 Hazardous Substances Regulations already provide for the planning authority to consult with the owner of the land on which a site is based prior to determining certain forms of development, including residential development, within the vicinity of an established site. Again, this helps to safeguard the site from new development that would be incompatible with its use as a hazardous substances site.

26. I have also considered the request that the consultation distances should be marked on the relevant map books.

27. A similar issue was raised during the examination of the adopted local plan, where the reporter concluded that it was not necessary to delineate the hazard consultation zones on the maps. Since that examination took place, the 2015 Hazardous Substances Regulations have been published, as set out above. Nevertheless, I can see no requirement within those regulations nor any other statutory basis that would require the consultation distances to be marked on the maps. I note there is no response from the Health and Safety Executive.

28. Paragraph 117 of circular 6/2013 ‘Development Planning’ sets out the scope of the examination process. Reporters are not tasked with making the plan as good as it can be, but with modifying those parts that are clearly inappropriate or insufficient. Whilst I accept that marking the consultation distances on the proposals and protect maps would aid developers in understanding where these limits lie, I do not find that their absence leads to a plan that is either inappropriate or insufficient.

<u>Category EDQ 2C Management areas - Noise</u>

29. A number of the representations raise concerns about the policy’s reference to and reliance on the council’s ‘Noise Guidance for New Developments’ (NGND).

Representations about this guidance were also raised as part of issue 24 'Quality of Development'. All these comments are considered below.

30. As part of issue 21, I have considered the appropriateness of deferring the detail of a policy to statutory supplementary guidance, to be prepared at a later date. In that issue I have concluded that based on the advice set out in planning circular 6/2013, it is acceptable to provide further policy detail in supplementary guidance, provided that it covers those topics identified in the plan as being the subject of supplementary guidance, and that there is an appropriate context in the plan.

31. Policy EDQ 2 establishes the principle that particular special features will need to be considered as part of any development proposal. Category EDQ 2C 'Management areas' sets out that development proposals will need to set out how any likely noise impacts, particularly in or adjacent to noise management areas, will be mitigated (although I note that currently there are not any noise management areas in North Lanarkshire). The policy does not refer to any forthcoming supplementary guidance on this issue, but highlights that developers should consult the council's NGND to assist with appraisals and consult with the relevant section of the council as required.

32. The council has confirmed that the NGND is non-statutory guidance. In its response to the representations, the council has indicated that supplementary guidance would be prepared, but in the meantime, developers are directed to the NGND for all sites.

33. As the policy makes no reference to the council's intention to prepare supplementary guidance, I sought clarification on this point. In response to my further information request, the council has confirmed its intention to bring forward statutory supplementary guidance in relation to noise, but "due to redeployment of council resources to respond to the impact of the Covid-19 pandemic, a revised preparation and consultation timetable is not yet available."

34. Whilst I have sympathy with the additional demand the pandemic has placed on council resources, I do not consider this to fully explain the apparent omission from the policy of the council's intention to publish supplementary guidance on this issue. Paragraph 140 of circular 6/2013 notes that supplementary guidance may be prepared and adopted alongside an LDP, or subsequently. Nevertheless, the intention to produce such guidance must be clearly referenced and included within the modified proposed plan.

35. Paragraph 148 of Circular 6/2013 states that non-statutory guidance does not form part of the development plan. Thus, whilst the NGND may be helpful in indicating the council's direction of travel, it does not have the same status as supplementary guidance.

36. In addition, as the council's NGND does not form part of the development plan, it is not before me for examination and hence I am not able to comment on its content and sufficiency. Nevertheless, I note the concerns raised in representations about the content of this non-statutory guidance and its apparent deviation from national policy and guidance on this issue, such as planning advice note (PAN) 1/2011.

37. Paragraph 139 of circular 6/2013, which sets out suitable topics for supplementary guidance, indicates that departures from national planning policy are not matters suitable for inclusion in supplementary guidance. Policy EDQ 2C does not indicate any intention for the council to deviate from the requirements of national policy. Nor, in response to the

representations or my further information request has the council indicated any intention to deviate from national policy. Thus, any (statutory) supplementary guidance that is prepared in relation to noise must be consistent with national policy.

38. I find the current wording of policy EDQ 2C could lead to confusion about the status of the NGND and its role in decision-making. As a non-statutory document, it may be a material consideration in decision making. However, the weight to be afforded to such guidance, particularly where it deviates from national policy and guidance would be a matter for the decision maker when considering an individual application. I am therefore, proposing a further modification to the policy to clarify the status of the guidance.

39. I conclude that the principle of the need to consider noise mitigation under certain defined conditions has been established in the modified proposed plan and that this would provide a sufficient 'hook' for linked supplementary guidance. This supplementary guidance would provide the fine detail of acceptable mitigation for noise and would need to be adopted as part of the modified proposed plan. However, as currently worded the policy omits to make reference to the council's intention to publish (statutory) supplementary guidance, as required by circular 6/2013. Furthermore, I note that there is no reference to this proposed supplementary guidance within the first appendix of the modified proposed plan, which sets out where new or updated supporting guidance will be required (although a reference is included within the proposed action programme). Therefore, in order to be compliant with the requirements of circular 6/2013, I have proposed a modification to the wording of the policy, which sets out the council's intention to prepare supplementary guidance. In addition, there would be a need to include reference to this proposed supplementary guidance within the appendix to the modified proposed plan.

40. In terms of the suggested effects of the policy on the delivery of particular sites, I note that the action programme identifies those allocations where noise impact assessments may be required. The sufficiency of the housing supply and its deliverability is addressed as part of issue 4.

<u>Category EDQ 2C Management Areas: Air Quality</u>

41. I interpret the representation as a general comment and note of caution concerning the approach to identifying which sites should be allocated for particular uses within the modified proposed plan. The comment appears to be particularly targeted in terms of consideration of sites that would be allocated for uses that would require regulation by SEPA.

42. I note that all allocated sites within the modified proposed plan have been subject to strategic environmental assessment. The assessment has included identification of any air quality and noise constraints (category E5). The findings of the strategic environmental assessment are documented in a number of supporting documents to the modified proposed plan (AD34, AD35, AD36, AD38, AD40).

43. As a result of the strategic environmental assessment, or in response to consultation responses, several sites are identified within the action programme as sites for which air quality assessments (or other assessments) may be required.

44. In addition to the identification of specific allocated sites where air quality assessments will be required, the modified proposed plan has identified air quality

management areas, which are delineated on the map book 'protect maps'. Any development in (or adjacent to) these areas will be subject to policy EDQ2 'Specific Features for Consideration', category EDQ 2C 'Management areas'.

45. The representation does not appear to have identified concerns about any specific site allocated within the Modified Proposed Plan. For the reasons set out above, I am content that the allocated sites have been subject to a systematic assessment for their suitability for development. As a result, all allocated sites within the Modified Proposed Plan are suitable for development in principle. I therefore see no need to make modifications to the proposed Policy.

Reporter's recommendations:

Category EDQ 2A Hazardous Zones: Flood Risk

1. Category EDQ 2A Hazardous Zones. The penultimate sentence of the first paragraph in column 2 should be modified as follows: after "….a precautionary approach is taken to flood risk from all sources." the full stop should be deleted and the text should continue "all sources….. taking account of the effects of climate change."

Category EDQ 2A Hazardous Zones: Hazardous substances sites

2. On page 86 of the Modified Proposed Plan, in the Table labelled "Category EDQ 2A Hazardous Zones":

- In left hand column, insert above 'Flood Risk' the words: "HSE Hazard Consultation Zones"
- In the right hand column insert the following new text after the first sentence ("The Council …..managing agencies"): "The Health and Safety Executive, together with SEPA and NatureScot, is a statutory consultee for development proposals within the consultation distance of Major Hazard Sites/ Pipelines. These are neither listed, nor mapped. It is also a statutory consultee for modifications to existing establishments which could have significant repercussions on major accident hazards; or other forms of development where the siting of development is such as to increase the risk or consequences of a major accident."

3. A consequential change will also be required to the wording of the current second sentence. The text "This includes, for flood-risk areas," should be deleted and replaced by "For flood-risk areas, development will be managed to allow …."

Category EDQ 2C Management Areas: Noise

4. The third sentence of the right hand box ("North Lanarkshire Council…..as required), should be deleted and replaced with:

"Developers should consult with the relevant section of the Council as required. Supplementary Guidance will be prepared to set out the application of the Policy, including the approach taken to assessment of noise levels and mitigation. This will be developed in line with the requirements of national policy and guidance. Until Supplementary Guidance is available, the Council's "Noise Guidance for New Developments", which can be accessed through the Council web site, provides further advice on this issue."

5. On page 88 of the Modified Proposed Plan, in the third paragraph headed "For Guidance on specific matters relating to relevant EDQ3 Sections", against item 'e', replace the existing text "e refer to …Air Quality" with:

"e Supplementary Guidance for noise will be developed. Until then, refer to Noise Guidance for New Developments. Also, refer to guidance for Air Quality."

6. On page 12 of the Modified Proposed Plan, 'Supporting Documents' under the heading 'Guidance' in the coloured box add: "Noise" to the end of the list of Supplementary Guidance, or Non-Statutory Planning Guidance that will be updated or brought forward.

Issue 024	**Quality of Development**	
Development plan reference:	Environmental & Design Qualities EDQ 3 Policy and Guidance Page 87 - 88	**Reporter:** Sue Bell

Body or person(s) submitting a representation raising the issue (including reference number):

Homes for Scotland (266)
Scottish Environmental Protection Agency (SEPA) (273)
Scottish Power (275)
Coatbridge LVA LLP (276)

Provision of the Development Plan to which the issue relates:	Placemaking Policies – Environmental and Design Qualities EDQ 3 Policy Quality of Development Development will only be permitted where high standards of site planning and sustainable design are achieved. EDQ 3 Guidance Applications will require to take account of the Site Appraisal required by Policies EDQ 1 and, if appropriate, EDQ 2. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

Planning authority's summary of the representation(s):

Homes for Scotland (266) and supporting documents RD235-RD237, objects to the requirement for specific connection speed on the grounds that the wider infrastructure network beyond a given site is not controlled by the homebuilders, so it is impossible for developers to upgrade it.

SEPA (273) objects to details in the wording of subsections b) and f) of the Policy.

Homes for Scotland (266) and supporting documents RD235-RD237, Scottish Power (275) and supporting document RD241, and Coatbridge LVA LLP (276) and supporting document RD242, object to the reference to North Lanarkshire's "Noise Guidance for New Developments" (AD52) in policy EDQ 3 on the grounds that the guidance is not compliant with Planning Advice Note 1/2011 (AD63), has not undergone any public consultation or formal approval process within the Council, so cannot be considered to be part of the statutory Development Plan, or used as a material consideration in the determination of any planning applications. Scottish Power (275) and supporting document 241, objects specifically to the Council refusing planning permission for Planning Application 18/00875/FUL on Existing Housing Development Sites NLMW0771 on the basis of "Noise Guidance for New Developments" (AD52). Coatbridge LVA LLP (276) and supporting document RD242 objects specifically to the use of the term "exceptional circumstances", as this is not included in PAN 1/2011.

Modifications sought by those submitting representations:

Homes for Scotland (266) seeks the deletion of Policy EDQ 3 subsection d).

Homes for Scotland (266), Scottish Power (275) and Coatbridge LVA LLP (276) seek the

removal of any requirement to refer to “Noise Guidance for New Developments”, in line with their representations to Policy EDQ 2.

SEPA (273) seeks the inclusion of wording within Policy EDQ3 subsection b) “Flood Risk” to ensure that sites are located outwith areas identified as functional floodplain, and additional text in subsection f) in relation to the protection of the water environment from construction activities and the legal requirement for “construction suds” to be an integral aspect of the quality of development.

Summary of response by planning authority:

Homes for Scotland (266) - Policy EDQ 3 subsection d) calls specifically for on-site fibre optic installation that can be connected to external networks whenever those networks are upgraded by other infrastructure providers. It makes sound forward planning sense that if internal networks allow for the data speeds mentioned, then there will be no need for further disruptive upheaval and upgrading within the site, once the wider network is upgraded, i.e., to future-proof the development. The Council does not agree that subsection d) should be deleted.

Homes for Scotland (266), Scottish Power (275) and Coatbridge LVA LLP (276) - The North Lanarkshire Council “Noise Guidance for New Developments” (NGND) (AD52) is not Supplementary Guidance. However, Supplementary Guidance on this matter is currently being developed by the Council, and in its absence developers are being directed towards “Noise Guidance for New Developments” in the meantime to cover all sites identified or not. This guidance will be developed in line with the most up to date legislation and guidance and will be applied to historic and future sites. It will also be subject to the full statutory consultation process before it is adopted as Supplementary Guidance.

The wording of the Policy is clear that “Only in exceptional circumstances should satisfactory internal noise levels only be achievable with windows closed and other means of ventilation provided” and “for the purposes of this guidance exceptional circumstances are considered to be proposals which aim to promote sustainable development and transport within the Local Authority area and which would provide benefits such as: (a) reducing urban sprawl (b) reducing uptake of greenfield sites (c) promoting higher levels of density near transport hubs, town and local centres (d) meeting specific needs identified in the local development plan

Exceptional circumstances will, therefore, generally apply only to sites, which are small to medium in scale, within urban areas. This may include sites in established residential areas; brownfield sites; town and village centres, and sites near public transport hubs”.

The Council stresses that it is for each individual local authority to prepare its own guidance and to encourage high quality development in line with good place making standards. The Council therefore does not agree that it is unreasonable for the applicant to demonstrate exception and this will be assessed through the development management process on a case by case basis.

Matters raised regarding a perceived Housing Land Supply shortfall are addressed under Issue 04 PROM LOC 3 Housing Development Sites.

SEPA (273) - The Council considers that flood risk is implicit within “the effects of climate

change." In addition, Policy EDQ 2 Category EDQ 2A Hazardous Zones Flood Risk states that SEPA's Flood Maps can be used to identify areas of functional floodplain to help ensure a precautionary approach is taken to flood-risk from all sources. The Council does not agree that there is a need for additional wording here.

The Council does agree that additional wording is required to protect the water environment from construction activities including an explicit requirement for "construction suds". Should the Reporter find it acceptable, the Council proposes adding the following text after the words "…and appropriate details" in the 4th sentence "…including during the construction phase…".

The Council also agrees that additional wording is required to highlight the importance of integrated blue-green infrastructure. Should the Reporter find it acceptable, the Council proposes to insert wording into PROM LOC 4 Guidance, as proposed in Issue 05 PROM LOC 4 Special Landscape Areas & Green Network.

Reporter's conclusions:

1. Policy EDQ 3 requires development to have high standards of site planning and sustainable design. Criteria to define a high quality of development are set out in paragraphs a – h of the policy. The representations address criteria b, d, e and f. In addition, in its response to Issue 22 – Site Appraisal, the council has proposed a modification to criterion c.

<u>Items listed under criterion b</u>

2. Criterion b lists aspects to be addressed in order to provide a safe, pleasant, inclusive, convenient and welcoming development. Developments are required to address adaptability including, as appropriate, to the effects of climate change and for residential development for specialist provision.

3. SEPA has requested that the criterion should be broadened to include specific reference to flood risk in association with climate change.

4. The policy criterion is concerned with ensuring that developments are adaptable, and hence resilient or capable of dealing with change driven by external factors. This includes, but is not exclusive to the effects of climate change.

5. The National Planning Framework 3 and Scottish Planning Policy acknowledge that climate change will increase the risk of flooding in some parts of the country. Scottish Planning Policy urges the planning system to take a precautionary approach to flood risk from all sources, taking account of the predicted effects of climate change. Nevertheless, increased flood risk is not the only predicted consequence of climate change; hotter drier summers for Scotland are also predicted. Thus, buildings may require resilience to a greater range of effects than flood risk alone.

6. The risk to development from flooding is addressed through a number of policies within the proposed plan. Policy PROT A 'Natural Environment and Green Network Assets' provides protection for natural and resilient sustainable places by safeguarding natural heritage assets. Watercourses and wetlands and flood plains are identified within category A4 'Urban Green Network' natural areas. Policy EDQ 1 'Site Appraisal' requires any proposed development to be appraised to ensure it will integrate successfully into the

local area and avoid harm to neighbouring amenity. This includes an assessment of the green network, landscape character and quality on the site and surrounding land use character area; and impacts associated with the holistic water environment and flood risk. In addition, policy EDQ 2 sets out specific features for consideration, which includes flood risk.

7. Given that flood risk is a recognised and integral consequence of climate change, I conclude that risks from flooding are implicit within the reference to climate change in criterion b of policy EDQ 3. Inserting a specific reference to flood risk within the criterion could act to narrow the scope of consideration of effects of climate change to that aspect alone, detracting from other consequences associated with climate change. I am content, that when considered in the round, the proposed plan includes a number of safeguards to ensure that the adaptability and resilience of properties specifically in relation to flood risk is addressed. Consequently, I do not consider that any modifications to the criterion are required.

Items listed under criterion c

8. As part of its response to a further information request, which I submitted in connection with issue 22, the council has proposed a modification to criterion c of policy EDQ 3. The proposed modification relates to the inclusion of targets for the reduction in greenhouse gas emissions from development, in line with the requirements of Section 3F of the Town and Country Planning (Scotland) Act 1997 (as amended).

9. Details of the representation which have prompted the proposed modification, the additional information provided by the council, and my reasoning for accepting the proposed modification are set out in issue 22. My proposed modification is set out below.

Items listed under criterion d

10. This criterion requires connection to the fibre optic network to ensure that next generation broadband speeds of 100 megabytes per second and above can be provided. The representor objects on the basis that the speed of broadband is reliant on the quality of the wider infrastructure and is not within the power of the individual homebuilders and developers to deliver. Whilst that may be the case, the policy does not ask homebuilders to ensure that such speeds are met; merely that the connections within the properties would be compatible with such speed.

11. Scottish Planning Policy (paragraph 289) expects the planning system to support development which helps deliver the Scottish Government's commitment to world-class digital connectivity; the need for networks to evolve and respond to technology improvements and new services; and inclusion of digital infrastructure in new homes and business premises.

12. Retro-fitting capacity is often more difficult and costly than providing for connection as part of the design. Installation of connection to the fibre optic network provides 'future-proofing' for development, allowing occupiers to benefit from infrastructure as and when it is upgraded. Whilst developers have no control over speeds within the wider network, they can influence the ability of development to connect to that network. Therefore, I do not consider that the criterion should be removed from the policy.

Criterion e: Noise Guidance for New Developments

13. A number of the representations object to the council's reference to and reliance on its non-statutory 'Noise Guidance for New Developments'. I have addressed these representations within issue 23.

14. I note the representation concerning refusal of planning permission on noise grounds. However, I consider that the issues raised are best considered as part of an appeal against that decision and are not for this examination.

Items listed under criterion f

15. Criterion f relates specifically to safeguarding the status of water bodies. The aspects to be considered focus upon the design and operation of the proposed development. SEPA has recommended a modification to ensure that protection is extended to the construction phase, in line with requirements set out in the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR).

16. The council accepts the need for additional wording and has proposed a modification to the policy. I am content that the council's proposed modification would address SEPA's concerns and recommend that the additional text is added to the policy.

17. The council has also suggested that additional wording is added to Policy PROM LOC 4 to highlight the importance of integrated blue-green infrastructure. My conclusions on this issue are addressed under issue 05.

Reporter's recommendations:

1. Under criterion c, the final sentence of the final bullet point, which currently concludes "…refurbished or re-purposed buildings." should be modified to read: "....refurbished or re-purposed buildings to meet the following carbon dioxide emissions standards, as set out in Building Standards Technical Handbook Section 7: Aspect Silver Level 1 (at least 10% reduction) by 2025 and Aspect Gold Level 1 (at least 15% reduction) by 2030."

2. Under criterion f, the fourth sentence, which starts "Sustainable Urban Drainage Systems…." should be modified by the addition of the words "…including during the construction phase…." After the words "..and appropriate details…" Thus, the fourth sentence should read: "Sustainable Urban Drainage Systems should be adopted within site design and appropriate details including during the construction phase, require to be submitted with any relevant planning application."

Issue 025	**Ravenscraig Regeneration Area**	
Development plan reference:	Area Strategies Pages 94 - 95	**Reporter:** Sue Bell

Body or person(s) submitting a representation raising the issue (including reference number):

Scottish Natural Heritage (SNH) (272)
Network Rail (274)
Ravenscraig Ltd (283)

Provision of the Development Plan to which the issue relates:	Area Strategies - Ravenscraig Ravenscraig is a National Development in National Planning Framework 3. Ravenscraig has been defined as General Urban Area. The existing Masterplan acts as a guide for the new Masterplan. Existing Development Sites are included in the Motherwell Local Area Partnership site lists and map. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

Planning authority's summary of the representation(s):

SNH (272) objects on basis that the Maps contained within this and the other area strategies do not contain a Key.

Network Rail (274) and supporting documents RD238-RD240, objects to the section in the Plan which states that a new town centre railway station is proposed as part of the Ravenscraig Masterplan. The current operation of the timetable would not facilitate a stop at a new station in the Ravenscraig area. On the basis that the potential for a new rail station at this location is not supported by the STAG Appraisal, it is suggested that the Local Development Plan considers an alternative option of investigating how new development and policy can support enhancements at existing stations, such as Carfin, Wishaw, Shieldmuir and Motherwell.

Ravenscraig Ltd (283) objects on the basis that the Area Strategy, as currently worded, and the related LDP Promote Maps and Protect Maps 11.5, 12.4, and 12.5 reflect the original Masterplan rather than the Revised Ravenscraig Masterplan.

Modifications sought by those submitting representations:

SNH (272) - A Key with associated legend should be provided alongside this and alongside all the Area Strategy Local Area Partnership Maps.

Network Rail (274) - Ravenscraig Masterplan should recognise that delivery of a railway station may not be achievable and that other public transport infrastructure options should be explored.

Ravenscraig Ltd (283) - Update Ravenscraig Regeneration Area Strategy text and Map Book Promote Maps Protect Maps 11.5, 12.4, 12.5 in line with Revised Ravenscraig Masterplan. Refer to the Planning Application 18/00463/PPP.

Summary of response by planning authority:

SNH (272) - The Area Strategy Local Area Partnership (LAP) Maps in the Plan are schematic extracts for indicative purposes only. Detailed maps are intended to be viewed digitally on the Council's Local Development Plan webpage, where a Key and associated legend are provided at the beginning of each Local Area Partnership.

Network Rail (274) - The Council notes the comments. The text proposed by the objector is considered by the Council to be a factual statement and will be updated before the Plan is Adopted. Policies PROM ID 1 Policy Transport Improvements and EDQ 3 Policy Quality of Development will be particularly relevant in assessing any future planning applications for development of this site and applicants will be required to demonstrate how sustainable transport options will be implemented as part of the site's delivery.

Ravenscraig Ltd (283) - The Council notes the comments. The proposed text is considered by the Council to be a factual statement and will be updated before the Plan is Adopted.

Reporter's conclusions:

Map Legend

1. Circular 6/2013 Development Planning sets out the required form and content of proposed plans. Paragraph 79 states that "Scottish Ministers expect LDPs to be concise, map-based documents, making use of plain language and a range of graphical techniques to convey the strategy and individual policies and proposals in an accessible way." It does not, however, specify how that mapped information should be presented.

2. I note the plans are intended for indicative purposes only. Nevertheless, it is a matter of good practice to include a key with a map. Without such a key, it is difficult for a reader to understand and interpret which areas have been allocated for what purpose. I do not consider it reasonable to expect a reader of the plan to have to cross-reference to the digital maps, in order to understand the annotations in the paper plan. Such an approach seems inconsistent with the principle of accessibility of such documents set out in circular 6/2013.

3. Given that a key has already been prepared and included within the paper copy of the modified proposed plan's accompanying map book, I do not see any barrier to including a similar key within the policy document to assist in interpreting the indicative area strategy maps. I do not, however, see a need to include a key as part of every area strategy map. A single key within the document should suffice for easy reference and comprehension. I therefore conclude that a copy of the map legends included within the map book should also be included within the policy document.

Railway Station

4. The representation from Network Rail concerns the feasibility of including a railway station within proposals for regeneration of Ravenscraig. I sought further information about this during the examination.

5. The redevelopment of Ravenscraig is identified as a national development in National Planning Framework 3 (NPF3). NPF3 indicates that the area will be redeveloped for a

range of uses and be guided by a masterplan, which "provides an opportunity to build in low carbon and environmental infrastructure, including heat networks, zero carbon buildings, digital connectivity, sustainable drainage solutions and open space." NPF3 does not specifically refer to a railway station as part of the regeneration proposals.

6. In response to my request for further information, Network Rail has confirmed that it has not been involved in recent discussions about a Scottish Transport Appraisal Guidance (STAG) appraisal in support of a railway station. Whilst there have been some discussions involving Network Rail concerning the potential to develop a freight terminal, at the time of this examination there had been no assessment of the feasibility of either a freight or a passenger service.

7. In its turn, the council has confirmed that the original masterplan for Ravenscraig included a railway station. Since then, a new masterplan has been granted planning permission in principle on 18 November 2020. The revised masterplan does not include for a railway station. A STAG appraisal for a railway station has not been conducted.

8. The council has stressed that the concept promoted in the area strategy for the Ravenscraig regeneration area is that the local development plan should defer final decisions about this major, multi-faceted regeneration project to the implementation of the masterplan and its elements. In support of this position, it notes that there is a constantly changing context for the regeneration process. It seeks to allow the local development plan to be flexible in the event of elements of the masterplan being added or subtracted during the development management process.

9. Based on the above, I conclude that the feasibility of providing rail links, for either freight and/or passengers has not been fully explored. The recently approved masterplan does not include for a railway station, but the submission of a revised masterplan is indicative that proposals may change in the future, in response to changing background conditions.

10. It seems to me that the paragraph to which Network Rail objected, is a statement of fact, which summarises the key elements that made up the masterplan that had received planning permission in principle at the time that the modified proposed plan was issued for consultation. Since that time, a new masterplan has been consented, which in turn includes for some modifications to the development proposals listed on page 94 of the modified proposed plan.

11. Whilst I accept the council's view that the paragraph to which Network Rail objected is one of fact, I am not persuaded by its argument that the text can be corrected at adoption to reflect the current masterplan. Whilst the plan would then be accurate on the day of publication, as already demonstrated, the masterplan may be subject to change, which would result in the modified proposed plan once again becoming out-of-date in respect of proposals for Ravenscraig.

12. The purpose of the area strategy for Ravenscraig is to set out support within the local development plan for the principle of regeneration of the site, in line with NPF3. It is not intended to provide the detail of the form that the regeneration will take; that is to be set out in the masterplan. This provides greater flexibility and speed in adapting or modifying proposals in the light of changing requirements and context. To that end, I see little point in updating the list of developments listed in the policy to reflect those included within the masterplan, when this could be subject to further change. The bullet points,

which summarise the key elements of the masterplan, could be omitted from the Area Statement with no dilution of support for the principle of regeneration of the area.

13. I therefore recommend that the first paragraph, which relates to the Ravenscraig masterplan, should be modified to remove the bullet points.

Accuracy of references to Masterplan

14. The representation objects to the text within the area strategy and the proposals maps referring to an earlier version of the masterplan, rather than the version in place at the time of this examination.

15. I have set out above my conclusions in relation to the purpose of the area strategy for Ravenscraig, and the importance of the masterplan in both defining the detail of development and providing flexibility to adapt more rapidly to changing circumstances than the modified proposed plan would be able to do. I have also concluded that there is no requirement to include the detail of the consented masterplan within the text of the modified proposed plan, given that this may be subject to future change. To that end, I find it to be potentially helpful that this area is classed as falling within the general urban area, as this provides support for development proposals without constraining any future masterplan proposals.

16. In its response to my request for further information, the council has proposed a modification to the wording of the final paragraph on page 94, under the heading 'National Development and Masterplan.' I find that the proposed wording helps to clarify that the masterplan, and hence the detail of development, may be subject to change. I therefore recommend that the modified wording is included within the plan.

17. Notwithstanding my comments above, I accept that the area strategy requires to be supported by a visual plan and that this should reflect the current masterplan, which has been consented.

Reporter's recommendations:

1. A copy of the 'LDP Promote Map Legend' and 'LDP Protect Map Legend' should be included within the Modified Proposed Plan Policy document.

2. On page 94 of the plan, under the heading 'Ravenscraig Masterplan', delete the last sentence, which starts "In summary, these were:…." and associated bullet points.

3. On page 94 of the plan, under the heading 'National Development and Masterplan', in the second sentence of the final paragraph, change "…as a guide on the development profile for the new Masterplan in terms…." To "…as a guide on the development profile for any revised Masterplan in terms…."

4. On page 95 of the plan, update the schematic map to reflect the Masterplan that received Planning Permission in Principle on 18 November 2020.

Issue 026	**Airdrie Local Area Partnership**	
Development plan reference:	Area Strategies Pages 96 - 100	**Reporter:** Robert Maslin

Body or person(s) submitting a representation raising the issue (including reference number):

Hallam Land Management (208)
Stewart Milne Homes (216)
Wallace Land Investments (220)
JH Civil Engineering (222)
Taylor Wimpey (225)
Albert Bartlett & Sons (Airdrie) Ltd (242)
Modern Housing Group (243)
Network Rail (274)
Orchard Brae Ltd (278)

Provision of the Development Plan to which the issue relates:	Area Strategies – Airdrie Local Area Partnership This extract shows what the Plan means for the Airdrie Local Area Partnership area, giving information on the number of each different type of centre and details of sites currently in the land supplies, sites proposed through the Plan, Town Centre Action Plans, transportation projects, potential Heat Energy Network sources and Locality Plans in the area. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

Planning authority's summary of the representation(s):

Hallam Land Management (208) and supporting documents RD069-RD079, objects to Policy PROM LOC 3 on the grounds that the hierarchy does not reflect the reality that planning applications are not submitted in an orderly way that will allow a sequential test to be applied; non-effective sites cannot be used to bolster the effective housing land supply; the Housing Land Requirement methodology, including Tables 1-6 on pages 140/141 of the Plan, does not accord with Clydeplan (AD59), Scottish Planning Policy (SPP)(AD60) or PAN 2/2010 (AD64); no Action Programme has been prepared and as such there is a lack of evidence of any programming of the housing land supply available for scrutiny; the housing land supply should be extrapolated to 2028/29 to determine whether or not the housing land requirements are met in full; the effective land supply does not account for the 1,700 planning demolitions by 2024 as set out in the Council's Ambition Programme Phase 1 and the evidenced shortfall in the accompanying "Housing Land Supply Statement" document (RD075) may be further exacerbated by the Council's Noise Guidelines (AD52), of which a minimum of 38 sites may be affected by environmental noise issues as defined by these guidelines.

Stewart Milne Homes (216.274) and supporting documents RD114-RD118, objects to the western boundary of Proposed Housing Site 03/08 at Mosside Farm, Airdrie (SM064), as shown on Map 8.4, seeking an extension to include the whole of CfS/MIR Site 0003/08 put forward.

Wallace Land Investments (220) and supporting documents RD136-RD143. A significant

housing land supply short fall has been identified in the effective housing land supply with the Airdrie and Coatbridge HMA, this shortfall amounting to 1,273 units in the period 2012-2024 and 1,034 units in the period 2024-2029. Land at Cumbernauld South West (site ref. 0008/06) (SM048), which straddles both Coatbridge and Airdrie LAPs, should be allocated for housing development as means of addressing, in part, this shortfall.

JH Civil Engineering (222) and supporting document RD146, objects to non-allocation of CfS/MIR Site 0005/07 (SM046) within Airdrie Local Area Partnership and its designation as Green Belt. The site should be allocated for leisure for the introduction of a hotel and conference centre.

Taylor Wimpey (225.**306) and supporting documents RD154-RD156, objects to the allocation** of Proposed Housing Development Site 01/07 P, Stirling Road/Greengairs Road, Stand (Mapbook 7.5). Questions the Council's site selection scoring and weighting mechanism and promotes CfS/MIR Site 0015/07 Glenmavis Road/Meldrum Mains, Glenmavis (SM021), as an alternative, which it considers to offer clear sustainability and deliverability benefits by extending an existing settlement compared to creating a new detached settlement.

Albert Bartlett & Sons (Airdrie) Ltd (242) supports the Vision of the Modified Proposed Plan, but objects unless changes are made to better reflect the requirements of Scottish Planning Policy (AD60).

Modern Housing Group (243.320) and supporting documents RD203 objects to the non-allocation of land at Arbuckle Road, East Plains (SM016) for housing (based on CfS/MIR Site 0026/07). The development of residential, nursing/care home, children's nursery and retail would provide a major benefit to the economy through the creation of long-term employment in addition to further community facilities for the local area.

Network Rail (274) and supporting documents RD238-RD240 objects to the non-allocation of CfS/MIR Site 0021/07 at Forrestfield, east of Caldercruix (047), for housing. The site is a brownfield site and development would be consistent with national and local planning policy.

Orchard Brae Ltd (278) supports the Council's designation to identify the Monkland Canal as a Visitor Economy Area and EuroCentral as a Strategic Business Centre and objects to Land at Orchard Brae not being allocated as a Proposed Housing Site within the Plan and the relevant Map Book.

Modifications sought by those submitting representations:

Hallam Land Management (208) seeks that the Council's site selection methodology is disregarded and replaced with a transparent site assessment for all sites submitted; delete PROM LOC 3 Policy and replace with:

"North Lanarkshire Council will provide a generous supply of land to maintain a minimum five year effective housing land supply at all times for each housing sub-market area and the local authority area to meet the housing supply targets set out in Clydeplan. Progress in meeting the housing supply targets will be monitored using housing completions to date and the programming of the effective housing land supply set out in the agreed housing land audit.

Where it is demonstrated that a five year effective housing land supply is not maintained at all times by the local authority area and/or housing sub-market areas, both brownfield and greenfield sites may be granted planning permission across the local authority area. In such a circumstance, the presumption in favour of development that contributes to sustainable development will be a significant material consideration. Sites will be supported where it is demonstrated that the following criteria are satisfied:

-the development will help remedy the shortfall identified;
-the development will contribute to sustainable development;
-the development will be in keeping with the character of the settlement and the local area;
-the development will not undermine Green Belt objectives; and,
-any additional infrastructure required as a result of the development is either committed or to be funded by the developer.

AND amend the second sentence in PROM LOC 3 Guidance to read as follows:

“The site criteria set out in the Policy PROM LOC 3 are based on the criteria set out in Clydeplan Strategic Development Plan Policy 8 as the steps required of local authorities to remedy shortfalls in the five year housing land supply”.

AND amend the Appendix: Housing Land Requirements to accord with Policy 8 of Clydeplan by deleting the whole of the section on page 128 of the Plan under ‘Local Development Plan policy’ and replace with:

“The Council will promote regeneration and sustainable economic growth to ensure that provisions are made to meet the housing land requirements set out in Clydeplan. The Council will provide a generous supply of land to maintain a minimum of five year effective housing land supply at all times for each housing sub-market area and the local authority area. Progress in meeting the housing supply targets will be monitored using housing completions to date and the programming of the effective housing land supply set out in the agreed housing land audit.

The Area Strategies contain the details of the land supply based on the Housing Land Audit 2017. Clydeplan requires up to date housing land supply data to be adopted to inform this Local Development Plan. Housing Land Audit 2018, once agreed with house building and infrastructure providers, will provide the most up to date housing land supply data from 2012 to 2029.

Where it is demonstrated that a five year effective housing land supply is not maintained at all times by housing sub-market area and/ or local authority area, further housing developments on greenfield or brownfield sites may be granted planning permission where there are in accord with Policy PROM LOC3 Policy Housing Development Sites.
AND delete all the tables and text from pages 139-143 of the Plan and replace with:

Table 1 All-Tenure North Lanarkshire Housing Land Requirement ***2012 - 2024***		***2024 - 2029***		***2012 - 2029***	
Housing Land Requirement *Source: Clydeplan SDP*	*14,630*		*6,100*	*20,730*	
Housing Completions (2012 to 2017) *Source: Housing Land Audit*	*4,673*	*0*		*4,673*	*minus*
Planned Demolitions *Source: Ambition Programme*	*1,700*	*0*		*1,700*	*plus*
Programming of Effective Land Supply *Source: Housing Land Audit*	*9,046*	*2,477*		*11,523*	*minus*
Surplus or Shortfall *Scale of Additional Allocations Required*	***-2,611***	***-3,623***		***-6,234***	*equals*

Modifications sought are in relation to Policy PROM LOC 3 and as such are addressed in Issue 04 PROM LOC 3 Housing Development Sites.

Stewart Milne Homes (216.274) seeks an extended western site boundary to Proposed Housing Development Site 03/08 (SM064) as shown in its attached Location Plan (RD118).

Wallace Land Investments (220) seeks the allocation of CfS Site 0008/06 (SM048) as a Proposed Housing Development Site within the Plan and the relevant Map Book.

JH Civil Engineering (222) seeks the allocation of Site 0005/07 (SM046) as a Proposed Leisure Development Site within the Plan and the relevant Map Book.

Taylor Wimpey (225.306) seeks the allocation of Site 0015/07 (SM021) at Glenmavis Road/Meldrum Mains, Glenmavis, as a Proposed Housing Development Site.

Albert Barlett & Sons (Airdrie) Ltd (242) seeks additional wording to be added to the third paragraph on page 96 of the Policy Document, beginning “Promoting Housing”, to read “…there are 34 existing housing development sites with capacity remaining to provide 744 housing units. There are 7 proposed housing sites with capacity to provide a minimum of a further 678 housing units. That means the minimum total amount of housing development opportunity in the Airdrie area is 1,422”.

Modern Housing Group (243.320) seeks the allocation of site as a Proposed Housing Development Site within the Plan and the relevant Map Book.

Network Rail (274) seeks the allocation of CfS/MIR Site 0021/07 at Forrestfield (047) as a Proposed Housing Development Site within the Plan and the relevant Map Book.

Orchard Brae Ltd (278) seeks inclusion of land at Orchard Brae (SM013) within the General Urban Area as a Proposed Housing Site.

Summary of response by planning authority:

As stated at Issue 04 PROM LOC 3, The Council's Site Selection Methodology Background Report (AD25) sets out the genesis, concept and implementation of the site selection process, .i.e., that a shortfall had been identified in Airdrie/Coatbridge Housing Sub-Market Area and how to address it in the forthcoming Local Development Plan. North Lanarkshire Local Development Plan Main Issues Report (MIR) Report on Responses and Site Options Consultation (AD22) in 2016 endorsed this approach and various sites were allocated as a consequence. Any impact on local infrastructure is built into the Action Programme (AD18). Some of the concerns raised can be alleviated, mitigated or avoided through the Development Management Process.

Hallam Land Management (208) - Matters raised in this objection are addressed within Issue 04 PROM LOC 3 Housing Development Sites.

Stewart Milne Homes (216.274) - Matters raised in this objection concerning the partial inclusion of CfS/MIR Site 0003/08 as Proposed Housing Development Site 03/08 and its western boundary are addressed within Issue 04 PROM LOC 3 Housing Development Sites and Issue 17 PP4 Green Belt.

Wallace Land Investments (220) - The Council considers that the matters raised are addressed within Issue 04 PROM LOC 3 Housing Development Sites. There is no need to release this land in Airdrie/Coatbridge Housing Sub-Market Area for housing development within such close proximity to South Cumbernauld Community Growth Area.

JH Civil Engineering (222) - The Council considers this as tourist accommodation, a specific use for which there is no requirement to allocate land. Whilst the Council is supportive of the provision of tourism and leisure facilities in principle, this is focussed towards the areas identified as Visitor Economy Areas and Visitor Economy Locations under Policy 2C Visitor Economy Areas & Locations. Applications for this type of accommodation/ land use will be assessed on a case-by-case basis, subject to the relevant policies in the Plan, to ensure that development is appropriate and supports the purpose of the place it is proposed within.

Taylor Wimpey (225.306) - The purpose of the Sustainability and Deliverability Matrix (AD22) was not to assess sites against each other in isolation, but to provide an indication of the issues and opportunities relating to individual sites, which would then be considered as part of a wider assessment. The site is well located in relation to supporting facilities in adjacent settlements.

Since publication of the Modified Proposed Local Development Plan (MPLDP), planning permission has been granted for a Residential-led, Mixed-use Development Comprising of up to 523 Residential Units (Class 9); Flexible Commercial/Retail/Community Uses (Classes 1, 2, 3, 4, 10); as well as Creation of Accesses; Landscaping; Car Parking and Associated Development at the Stirling Road/ Greengairs Road site subject to conclusion of a Section 75 (18/01785/PPP), which is some 223 additional units than the stated

capacity in the MPLDP.

Albert Bartlett & Sons (Airdrie) Ltd (242) - Matters raised in this objection relating to the Effective Housing Land Supply and Housing Land requirement are addressed under Issue 04 PROM LOC 3 Housing Development Sites and Issue 17 PP4 Green Belt. The Council does not agree that the additional wording sought is required or appropriate.

Modern Housing Ltd (243.320) - Matters raised in this objection relating to the Effective Housing Land Supply and Housing Land requirement are addressed under Issue 04 PROM LOC 3 Housing Development Sites and Issue 17 PP 4 Green Belt. The Site Sustainability and Deliverability Matrix indicated that other sites were considered to be more sustainable in offering opportunities to deliver new houses.

Network Rail (274) - The 4 or 5 remaining houses in Forrestfield are too few for it to be given a “village envelope”. The Proposed site is therefore remote and only accessible by unsustainable modes of transport. Any planning application for housing will be assessed on a case-by-case basis, subject to the relevant policies in the Plan.

Orchard Brae Ltd (278) - The Council feels that there is an effective five-year housing land supply and no need for a release of land of this strategic scale in an area where the aims of the Green Belt in preventing the merging of Coatbridge, Airdrie and Calderbank are relevant, along with the presence of a Scheduled Monument (Monkland Canal) and a Site of Importance for Nature Conservation. An application for planning permission for this site is being assessed through the Development Management process, with a significant number of objections received.

Reporter’s conclusions:

Housing land supply

1. Representation 208 objects to the Airdrie Local Area Partnership section of the proposed plan. The ground for objection is that the housing land supply is inadequate. Housing land supply is addressed in issue 4: Housing Development Sites.

Mosside Farm, Airdrie

2. Representation 216 (Mosside Farm, Airdrie) is addressed in issue 4.

Land at Cumbernauld South West

3. As well as being included in issue 26, representation 220 is recorded in issues 1, 2, 4 and 28. What follows addresses the parts of representation 220 that contend that the land at Cumbernauld South West is suitable for housing development.

4. Among other things, representation 220 says that residential and associated development on the land south west of Cumbernauld would accord with policy 8 of Clydeplan, would not be detrimental to landscape or ecology, would have excellent links to rail and bus services, would be within walking distance of schools, local services and other amenities and would have convenient access to A73. Potential impacts identified in the council’s Strategic Environmental Assessment have been addressed in the Development Framework Report.

5. The Development Framework Report says that removal of the site from the green belt would not impact on the ability of the remaining green belt around Cumbernauld to achieve the purposes of a green belt.

6. I find that the site's suitability for the development sought in the representation is an important consideration, but only if there is a need to identify more land for housing development than what is contained in the proposed plan. This last point is addressed in issue 4, which concludes that sufficient land for housing has been identified in the Cumbernauld housing sub-market area. Consequently there is no imperative for us to identify further land for housing in this sub-market area.

7. The representation does not argue that the site has no merit as part of the green belt and so should be removed from the green belt whether it is or is not allocated for development. The representation seeks removal of the site from the green belt solely as a consequence of allocating it for housing development.

8. From the submissions and from what I have seen during a site inspection, I find no reason to exclude the site from the green belt. The site makes a positive contribution to the green belt around Cumbernauld. The proposed plan need not be altered.

Site at junction of Stirling Road and Greengairs Road, Riggend

9. A representation seeks allocation of this site for use as a hotel and conference centre with associated leisure facilities such as a hotel bar, restaurant, pool and spa.

10. I note that, in the proposed plan, land directly to the south of the site is identified as a proposed housing site (01/07P). The representation refers to an application for planning permission for construction of 523 dwellings. This application has now been approved.

11. From my inspection, I note that the representation site is open to view from the adjoining roads. Apart from these roads, the site boundary is not marked by any feature of landscape significance. The surroundings to the north and east are of rural character, notwithstanding the two transmitter masts near to the east side of the site. From its south-western corner beside the roundabout, the site has a gentle rise to the north-east. These various considerations lead me to find that the proposed development would be prominent within the immediate locality.

12. The existing roadside development to the west of the site is limited in scale and is "backgrounded" by woodland. It would do little or nothing to reduce the impact of what is proposed for the representation site.

13. The northern boundary of site 01/07P is defined by Greengairs Road. Just inside this boundary there are trees. They provide screening which no doubt could be augmented by any new planting associated with the proposed housing development. I find that Greengairs Road provides a green belt boundary that is much more satisfactory than a boundary that excluded the representation site from the green belt.

14. During my inspection, I noted the potato-processing factory to the south-west. The factory is of considerable size, but I find that its distance from the representation site is such that it has no significant bearing on whether the representation site should be in the green belt.

15. With regard to provision of an amenity for Wattston and Greengairs, I find that, while it is likely that some villagers would welcome the proposed development, its size is such that it would be primarily dependent on custom from further afield. This is reflected by the amount of car parking shown on the proposed site plan.

16. I find that the representation site is an effective and important part of the green belt. It will form a significant and worthwhile part of the setting of the evolving urban area to the south. It is likely that other, more suitable, sites could be found for development of the kind that is proposed, especially bearing in mind the town centre first principle to which reference is made in the representation.

17. My conclusion is that the representation site should remain in the green belt. There is no need to alter the proposed plan.

Housing land supply, a site at Stirling Road, Stand, Airdrie, and a site at Glenmavis

18. A representation contends that the proposed plan makes inadequate provision for housing land. The representation objects to allocation of a site (reference 01/07P) for housing at Stirling Road/Greengairs Road, Stand. The representation also seeks housing development on a site at Meldrum Mains and Glenmavis Road, Glenmavis. All aspects of the representation are addressed in issue 4.

"Promoting housing"

19. Representation 242 seeks amendments to the "Promoting housing" text on page 96 of the proposed plan. The additional text that is sought is shown by the underlining:

> "….. There are 7 proposed housing sites with capacity to provide a minimum of a further 678 housing units. That means the minimum total amount of housing development opportunity in the Airdrie area is 1,422."

20. The representation refers to Scottish Planning Policy and the vision of the proposed plan but does not explain in what way the text on page 96 fails adequately to reflect these two matters.

21. The changes sought in the representation suggest a desire to ensure that the numbers of dwellings contained in the table on page 96 are not interpreted as the maximum amount of development on each site. I find that numbers of these kind are usually based on an average density and that variations from them – either up or down – often occur once detailed site investigations have been carried out and site layouts designed. Thus, on some sites planning permission may be granted for more dwellings than the number in the table, provided the design of the development is satisfactory, meeting, among other things, the requirements of EDQ 3 POLICY Quality of Development.

22. My conclusion is that the proposed plan need not be altered.

Land at Arbuckle Road, Plains

23. Representation 243-320 objects to the countryside designation of the site at Arbuckle Road, Plains. The site should be identified for housing development. The site could accommodate some 255 dwellings, including 32 affordable dwellings, along with a

care home facility, children's nursery, retail space and landscaping.

24. So far as I am aware, the site to which representation 243-320 directly refers is not included in the Main Issues Report, has not been the subject of public consultation and has not been subject to strategic environmental assessment. Paragraph 118 of circular 6/2013: Development Planning says:

> "Reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites."

25. I am mindful that the area of land being promoted by the representor (shown on site map SM016) is a smaller component of a wider area of land previously considered and ruled out by the council under site reference 0026/07, at the Main Issues Report stage. I have reviewed the council's site assessment findings for the larger site, and compared these to the alternative evidence presented by the representor in support of the amended, smaller area of land for which an allocation is now being sought. I consider the differences are sufficient to indicate that the revised site represents a materially different proposition to site 0026/07, despite the overlap in proposed boundaries and despite SM016 being a smaller area. As no consultation has been undertaken in respect of this revised site area, and as the council's assessment of site 0026/07 cannot safely be extrapolated to apply to the smaller site, I find it would not be appropriate to recommend altering the proposed plan in response to the representation.

<u>Land at Forrestfield</u>

26. Representation 274 seeks residential development on a site at Forrestfield. The south boundary of the site adjoins A89 and the north boundary adjoins the Airdrie to Bathgate railway line. The A89 frontage is about 180 metres long. The site is about 25 metres wide. A layout plan submitted with the representation shows eight houses arranged as four semi-detached pairs.

27. From my site inspection, I note that the site is clear of any previous buildings. There are two houses to the west of the site. To the east is Woodside Road, then an open yard associated with workshop buildings, then four houses facing the main road and finally an open yard. The surrounding area is rural in character. An asphalt plant some 500 metres to the south is not readily visible from Forrestfield.

28. In the proposed plan, the site and its surroundings are designated as countryside.

29. I do not agree with the suggestion that National Planning Framework 3 and Scottish Planning Policy lend support to the proposed development. The site is isolated from communities that provide services and facilities such as shops, schools and employment. Residents in the proposed houses would be likely to be highly car-dependent. National Planning Framework 3 (paragraph 5.5) says that greenhouse gas emissions from the transport sector remain high. The aim is "to significantly increase levels of everyday cycling and walking within and between our settlements ….." This is echoed in Scottish Planning Policy (paragraph 273): "The spatial strategies set out in plans should support development in locations that allow walkable access to local amenities and are also accessible by cycling and public transport." I find that the proposed development would conflict with these important parts of national policy.

30. With regard to Clydeplan policy on reuse of redundant land, the glossary in Clydeplan gives a definition of brownfield land and then goes on to say: "A brownfield site should not be presumed to be suitable for development, especially in Green Belt and other countryside areas."

31. In the proposed plan, policy 5: Countryside gives support to "limited development such as Visitor Economy related development, extending existing businesses and settlements, and agricultural diversification." I am not convinced that Forrestfield may be described as a settlement, bearing in mind how few houses it has. I find that what the representation seeks is more akin to "sporadic and isolated development in the Countryside" which, according to policy 5, is to be resisted.

32. The representation refers to traditional siting and to recreating and knitting the street frontage together. I am not convinced that the illustrative layout shown in the submission would do this, but, even if development could be laid out in a more attractive manner, an overriding consideration is proximity to and direct access from a rural section of a main road on which traffic speeds are likely to be quite high. The proximity of the main road would result in an unacceptably poor environment for a residential development.

33. I note the contention that the proposed development would be acceptable in relation to mining subsidence, flood risk, natural heritage and built heritage. I find that these considerations do not outweigh the conflict with planning aims and policies.

34. My conclusion is that the representation site should not be identified for housing development, despite the finding in issue 4 that there is a shortfall in housing land to meet the housing land requirement in the Airdrie and Coatbridge housing sub-market area. The proposed plan need not be altered.

Land at Orchard Brae

35. Representation 278 (land at Orchard Brae) is addressed in issue 17 Green Belt – Purpose of Place.

Reporter's recommendations:

No modifications required.

Issue 027	**Bellshill Local Area Partnership**	
Development plan reference:	Area Strategies Pages 102 - 106	**Reporter:** Robert Maslin
Body or person(s) submitting a representation raising the issue (including reference number):		
Harper Macleod LLP (205) Taylor Wimpey Strategic Land (218) Wallace Land Investments (219) Strockweld (257) Trustees of the Douglas Support Estate (260)		
Provision of the Development Plan to which the issue relates:	Area Strategies – Bellshill Local Area Partnership This extract shows what the Plan means for the Bellshill Local Area Partnership area, giving information on the number of each different type of centre and details of sites currently in the land supplies, sites proposed through the Plan, Town Centre Action Plans, Green Network improvement opportunities, transportation projects, potential Heat Energy Network sources and Locality Plans in the area. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		

Harper Macleod LLP (205) and supporting document RD064, objects to the designation of land at CfS/MIR Site 0001/13 Bankhead Farm, Bargeddie (SM049), as Green Belt. The land should be allocated for either Business and Industry (Classes 4, 5 and 6), or Mixed Use, including Market Garden, farmhouse extension and other rural enterprises, e.g., Farmhouse café, rural crafts, tree/plant nursery, etc., with associated employment.

Taylor Wimpey Strategic Land (218) and supporting document RD127 and Wallace Land Investments (219) and supporting documents RD128-RD135, object to the settlement boundary shown for the Bellshill Local Area Partnership Map Book pages 9.3 and 10.3, regarding Newlands Farm (SM049).

Wallace Land Investments (219) and supporting documents RD128-RD135, objects to the Council's identified five-year Effective Housing Land Supply and the existing housing development sites shown on page 105 of the Modified Proposed Plan. Reference is made to a Housing Land Supply Statement prepared by Geddes Consulting, to be read in conjunction with the representation.

Strockweld (257) and supporting documents RD216 & RD217, objects to the site of the former Derby Inn, 607 Main Street, Mossend, and works at Marion Street, Mossend (SM025), being designated within the Mossend Strategic Business Centre, as it should be allocated as a Proposed Housing Site.

Policies PROM LOC2, PP2A and AD2A relating to the Strategic Business Centres lack flexibility. They fail to allow for opportunities for non-business use in appropriate locations, where this could involve development compatible with adjacent residential areas, or

where a surplus of land for business and industrial exists. The Adopted North Lanarkshire Local Plan Policy EDI1 allows for any surplus in the land supply to be taken into account in considering changes of use. Retaining this Policy would provide a strong basis for supporting an alternative use of the site.

Trustees of the Douglas Support Estate (260) object to the designation of land between the A8 and M8, south of Coatbridge, Midshawhead (SM002), as being located within the Bellshill Local Area Partnership area. The site has been physically separated from Bellshill since the replacement M8 between Baillieston and Newhouse was completed in April 2017. It would be more logically to apportion it to the adjoining Coatbridge Local Area Partnership area.

Modifications sought by those submitting representations:

Harper Macleod LLP (205) - Remove site (SM049) from Green Belt and allocate as a Proposed Business Development Site in the Bellshill Local Area Partnership.

Taylor Wimpey Strategic Land (218) and Wallace Land Investments (219) seek land at Newlands Farm, Birkenshaw (SM040), to be included in the General Urban Area, removed from the Green Belt and allocated as a Proposed Housing Development Site, with relevant parts of the Plan and Map Book modified to reflect accordingly.

Strockweld (257) - Remove the area indicated in its attached plan (SM607) from the designated Strategic Business Centre, allocate it as a Proposed Housing Site, with capacity for 30 units, and modify the relevant sections of the Plan to reflect accordingly.

Trustees of the Douglas Support Estate (260) - Amend the Bellshill/Coatbridge Local Area Partnerships boundary. Remove this site (SM002) from the Green Belt and designate it as either a Strategic Business Centre, or Proposed Housing Development Site within the Coatbridge Local Area Partnership.

Summary of response by planning authority:

Harper Macleod LLP (205) - The site was assessed at Site Selection Stage 4 (AD25 page 44) according to Need & Demand. Proposed business and industry developments were assessed against the respective outcomes of the Places for Business & Industry Charrette (AD30) and proposed Business Centres. As there is no shortfall in the Industry and Business Land Supply, no further sites are required and the Council does not agree that the site should be removed from the Green Belt. Purpose of Place Policy PP 4 and Amount of Development Policy AD 4 are supportive in principle of developments for agriculture, forestry, countryside recreation, or those that require a non-urban location, including, where appropriate, Visitor Economy related development, subject to determination through the Development Management process.

Taylor Wimpey Strategic Land (218) and Wallace Land Investments (219) - The Council sets out its position regarding the Housing Land Supply under Issue 04 PROM LOC 3 Housing Development Sites. Policy PROM LOC 3 sets out the Council's preferred sequence for determining where any additions to the land supply should be located, in the event that a shortfall in the 5-year supply is identified at any time during the lifetime of the Plan. The Council maintains sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that this does not represent a suitable location justification for any further release. The principle of removing the current Green

Belt designation at this location is dealt with under Issue 17 PP 4 Green Belt.

Strockweld (257) - The Council considers that as the adjacent uses to the site are a mixture of urban uses, including residential, it would be appropriate to extend the General Urban Area to include this site. The Council does not agree that there is a sufficient justification for allocating the site specifically for housing, allowing any forthcoming planning applications to be determined through the Development Management process. As stated at Issue 03 PROM LOC 2 Business Development Sites, should the Reporter find it acceptable, the Council proposes an extension of the adjacent Land Use Character Area General Urban Area to cover this site, as the uses adjacent to this site are a mixture of residential and commercial uses.

Trustees of the Douglas Support Estate (260) - The Council maintains sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that this does not represent a suitable location justification for any further release. The principle of removing the current open space designation at this location is dealt with under Issue 17 PP 4 Green Belt.

The subdivision of the Council area into Local Area Partnerships is wholly an internal administrative matter, outwith the scope of the Local Development Plan. Notwithstanding, the same case made by the objector could be made in relation to the A8, which forms the current boundary locally.

Reporter's conclusions:

Bankhead Farm, Bargeddie

1. Representation 205 says that the Bankhead Farm operations are commercially unviable as a result of loss of access and reduction in size following construction of the M8. There is a requirement for a positive strategy for the site to diversify its offer and to ensure it does not become vacant and derelict.

2. During my inspection, I noted that most of the site is improved grassland, in use for sheep grazing. I am not aware of what conclusions were drawn regarding viability at the time when land was being acquired for the M8 project. If the holding is indeed now too small to be viable, this does not necessarily mean that continued agricultural use and maintaining the land in good heart should not continue if, for example, it were possible to work the land in conjunction with some other farm unit.

3. It is submitted that construction of the M8 and consequent lack of access have had an adverse effect on businesses operating from Bankhead Farm. The representation also expresses confidence that suitable access can be achieved for the proposed business and industrial uses.

4. During my inspection, I noted that access to the site is from the A8 by means of a bridge over the M8 motorway. The A8 is a dual-carriageway road. There is no gap in the central concrete wall at the Bankhead Farm access. Thus, all traffic wishing to enter the site must approach from the east and all traffic leaving the site must turn to the west. There appears to be no opportunity on the A8 to turn round within two or three kilometres of the access. I am not convinced that the Bankhead Farm access arrangement is suitable for the increased range of activities envisaged in the representation.

5. I note that business and industrial uses are established at the farmhouse complex and that businesses have operated successfully. Evidence does not demonstrate that there is a need to expand such operations onto adjoining land – especially an expansion that would occupy nine hectares.

6. It is submitted that the supply of land for business and industry is deficient in terms of sites that are well-located with modern, small-to-medium sized buildings. As indicated above, I am not convinced that the site has a suitable access arrangement. I note what is said about lack of convenient public transport, but the fact remains that the proposed development would be likely to be entirely dependent on private vehicles for all trips.

7. Regarding green belt policy, the nearest settlement is said to be Bargeddie. I note that the Kirkshaws and Kirkwood areas of Coatbridge are also nearby. I find that development on the representation site would have no significant connection with any of these places in terms either of access or of townscape. Development on the nine-hectare part of the site would be an isolated enclave surrounded by green belt. It would do nothing to protect or enhance the character, landscape setting or identity of the existing settlements.

8. I note reference to rural enterprises. It may be that uses such as market gardening and a tree nursery would be considered acceptable without need to remove the green belt designation.

9. My overall conclusions are that the site should remain in the green belt and that the proposed plan need not be altered.

Newlands Farm, Uddingston

10. Representations 218 and 219 relate to adjoining sites at Newlands Farm, Uddingston. They are addressed in issue 4 Housing Development Sites.

Site at 607 Main Street, Mossend

11. Representation 257 (site at 607 Main Street, Mossend) is addressed in issue 3 Business Development Sites.

Land between the A8 and M8 at Midshawhead, South of Coatbridge

12. Representation 260 (land between the A8 and M8 at Midshawhead, South of Coatbridge) is addressed in issue 3 Business Development Sites.

Reporter's recommendations:

No modifications required.

Issue 028	**Coatbridge Local Area Partnership**	
Development plan reference:	Area Strategies Pages 108 - 111	**Reporter:** Robert Maslin

Body or person(s) submitting a representation raising the issue (including reference number):

Hallam Land Management (208)
Rossco Properties Ltd (211)
Wallace Land Investments (220)
Taylor Wimpey (225)
Cleland Ltd (241)
Miller Homes (259)
Trustees of the Douglas Support Estate (260)
Woodlands Trust Scotland (293)

Provision of the Development Plan to which the issue relates:	Area Strategies – Coatbridge Local Area Partnership This extract shows what the Plan means for the Coatbridge Local Area Partnership area, giving information on the number of each different type of centre and details of sites currently in the land supplies, sites proposed through the Plan, Town Centre Action Plans, transportation projects, potential Heat Energy Network sources and Locality Plans in the area. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

Planning authority's summary of the representation(s):

Hallam Land Management (208) and supporting documents RD069-RS079, objects to the omission of CfS/MIR Site 0009/06 North Myvot Farm (SM050) on the grounds a significant housing land supply shortfall has been identified in the effective housing land supply and additional allocations are required to meet housing need. Also objects to Policy PROM LOC 3 on the grounds that the hierarchy does not reflect the reality that planning applications are not submitted in an orderly way that will allow a sequential test to be applied; non-effective sites cannot be used to bolster the effective housing land supply; the Housing Land Requirement methodology, including Tables 1-6 on pages 140/141 of the Plan, does not accord with Clydeplan (AD59), Scottish Planning Policy (SPP) (AD60) or PAN 2/2010 (AD64). No Action Programme has been prepared and as such there is a lack of evidence of any programming of the housing land supply available for scrutiny; the housing land supply should be extrapolated to 2028/29 to determine whether or not the housing land requirements are met in full; the effective land supply does not account for the 1,700 planning demolitions by 2024 as set out in the Council's Ambition Programme Phase 1 and the evidenced shortfall in the accompanying 'Housing Land Supply Statement' document may be further exacerbated by the Council's Noise Guidelines (AD52), of which a minimum of 38 sites may be affected by environmental noise issues as defined by these guidelines.

Rossco Properties (211) objects to the Energy from Waste permission at Carnbroe, Coatbridge, not being shown an Energy from Waste allocation. It is shown in the Adopted Local Plan with a clear "W".

Wallace Land Investments (220) and supporting documents RD136-RD143. A significant housing land supply short fall has been identified in the effective housing land supply with the Airdrie and Coatbridge HMA, this shortfall amounting to 1,273 units in the period 2012-2024 and 1,034 units in the period 2024-2029. CfS/MIR Site 0008/06 Cumbernauld South West (SM048), which straddles both Coatbridge and Airdrie LAP areas, should be allocated for housing development as means of addressing, in part, this shortfall.

Taylor Wimpey (225.300) and supporting documents RD157 & RD158; Taylor Wimpey (225.83) and supporting documents RD152-RD153; Taylor Wimpey (225.306) and supporting documents RD154-RD156 and Cleland Ltd (241) and supporting document RD202 object but no comment provided.

Miller Homes (259) and supporting documents RD221-RD226, objects to non-allocation of land at Ryefields, Glasgow Road, Drumpellier (SM017) as a Proposed Housing Development Site.

Trustees of the Douglas Support Estate (260) object to the designation of land between the A8 and M8, south of Coatbridge, Midshawhead (SM002), within the Green Belt. The Green Belt at this location is compromised due to the constraints of trunk roads on either of its sides. The site is well located on a major junction that links east west traffic through Central Scotland, and north-south traffic linking the two sides of Lanarkshire.

Woodlands Trust Scotland (293) objects to the allocation of Existing Housing Development Site NLMK1190 (Map Book 9.4), Proposed Housing Development Sites 06/09 Former Drumpark School, Bargeddie (Map Book 9.3), and 01/10 Sweethill Terrace/Deanston Place, Carnbroe (Map Book 9.4), and Proposed Business Development Site 02/10 Carnbroe, Coatbridge (Map Book 9.4), on the grounds of the presence of ancient woodland and native woodland.

Modifications sought by those submitting representations:

Hallam Land Management (208) seek the allocation of CfS/MIR Site 0009/06 (SM50) as a Proposed Housing Development Site.

AND seek that the Council's site selection methodology is disregarded and replaced with a transparent site assessment for all sites submitted; delete PROM LOC 3 Policy and replace with:

"North Lanarkshire Council will provide a generous supply of land to maintain a minimum five year effective housing land supply at all times for each housing sub-market area and the local authority area to meet the housing supply targets set out in Clydeplan. Progress in meeting the housing supply targets will be monitored using housing completions to date and the programming of the effective housing land supply set out in the agreed housing land audit.

Where it is demonstrated that a five year effective housing land supply is not maintained at all times by the local authority area and/or housing sub-market areas, both brownfield and greenfield sites may be granted planning permission across the local authority area. In such a circumstance, the presumption in favour of development that contributes to sustainable development will be a significant material consideration. Sites will be supported where it is demonstrated that the following criteria are satisfied:

-the development will help remedy the shortfall identified;
-the development will contribute to sustainable development;
-the development will be in keeping with the character of the settlement and the local area;
-the development will not undermine Green Belt objectives; and,
-any additional infrastructure required as a result of the development is either committed or to be funded by the developer.

AND amend the second sentence in PROM LOC3 Guidance to read as follows:
"The site criteria set out in the Policy PROM LOC3 are based on the criteria set out in Clydeplan Strategic Development Plan Policy 8 as the steps required of local authorities to remedy shortfalls in the five year housing land supply,"

AND amend the Appendix: Housing Land Requirements to accord with Policy 8 of Clydeplan by deleting the whole of the section on page 128 of the Plan under 'Local Development Plan policy' and replace with:

"The Council will promote regeneration and sustainable economic growth to ensure that provisions are made to meet the housing land requirements set out in Clydeplan. The Council will provide a generous supply of land to maintain a minimum of five year effective housing land supply at all times for each housing sub-market area and the local authority area. Progress in meeting the housing supply targets will be monitored using housing completions to date and the programming of the effective housing land supply set out in the agreed housing land audit.

The Area Strategies contain the details of the land supply based on the Housing Land Audit 2017. Clydeplan requires up to date housing land supply data to be adopted to inform this Local Development Plan. Housing Land Audit 2018, once agreed with house building and infrastructure providers, will provide the most up to date housing land supply data from 2012 to 2029.

Where it is demonstrated that a five year effective housing land supply is not maintained at all times by housing sub-market area and/ or local authority area, further housing developments on greenfield or brownfield sites may be granted planning permission where there are in accord with Policy PROM LOC3 Policy Housing Development Sites.
AND delete all the tables and text from pages 139-143 of the Plan and replace with:

Table 1 All-Tenure North Lanarkshire Housing Land Requirement ***2012 - 2024***	***2024 - 2029***	***2012 - 2029***	
Housing Land Requirement *Source: Clydeplan SDP*	*14,630*	*6,100*	*20,730*
Housing Completions (2012 to 2017) *Source: Housing Land Audit*	*4,673*	*0*	*4,673*	*minus*
Planned Demolitions *Source: Ambition Programme*	*1,700*	*0*	*1,700*	*plus*
Programming of Effective Land Supply *Source: Housing Land Audit*	*9,046*	*2,477*	*11,523*	*minus*
Surplus or Shortfall *Scale of Additional Allocations Required*	***-2,611***	***-3,623***	***-6,234***	*equals*

Rossco Properties Ltd (211) seeks that the Plan Map Book for Coatbridge be changed to ensure that this land is shown clearly with a “W” reflecting its Energy from Waste allocation and planning approval.

Wallace Land Investments (220) seeks the allocation of CfS/MIR Site 0008/06 (SM048) as a Proposed Housing Development Site and consequent amendments to the relevant sections of the Plan and Map Book.

Taylor Wimpey (225.300), (225.283), (225.306); Cleland Ltd (241) - No modification offered.

Miller Homes (259) seeks removal of the “Ryefields” (SM017) from the Green Belt and its allocation as a Proposed Housing site in the Coatbridge Local Area Partnership area.

Trustees of the Douglas Support Estate (260) seek removal of the land (SM002) from the Green Belt and its allocation as either a Strategic Business Centre, or a large-scale housing site in the Coatbridge Local Area Partnership area instead.

Woodlands Trust Scotland (293) seeks the deletion of both Existing Housing Development Site NLMK1190 and Proposed Housing Development Site 01/10 Sweethill Terrace/Deanston Place, Carnbroe (both Map Book 9.4), on the grounds of potential loss of native woodland, that in any implementation of Proposed Housing Development Site 06/09 Former Drumpark School, Bargeddie (Map Book 9.3), the areas of woodland are protected from any negative impacts of developments that should be specified in the site-specific requirements, as ancient woodland may have been omitted from the Ancient Woodland Inventory, despite being identified on the Native Woodland Survey of Scotland,

and that development of Proposed Business Development Site 02/10 Carnbroe, Coatbridge (Map Book 9.4), should be located away from the woodland area, which is located to the western area of the site.

Summary of response by planning authority:

As stated at Issue 04 PROM LOC 3, the Council's Site Selection Methodology Background Report (AD25) sets out the genesis, concept and implementation of the site selection process, .i.e., that a shortfall had been identified in Airdrie/Coatbridge Housing Sub-Market Area and how to address it in the forthcoming Local Development Plan. North Lanarkshire Local Development Plan Main Issues Report (MIR) Report on Responses and Site Options Consultation in 2016 (AD22) endorsed this approach and various sites were allocated as a consequence. Any impact on local infrastructure is built into the Action Programme (AD18). Some of the concerns raised can be alleviated, mitigated or avoided through the Development Management Process.

Hallam Land Management (208) - The Council considers that the matters raised are addressed under Issue 04 PROM LOC 3 Housing Development Sites. There is no need to release this land in Airdrie/Coatbridge Housing Sub-Market Area for housing development within such close proximity to South Cumbernauld Community Growth Area. Planning Appeal PPA-320-2126 against the Council's refusal of Planning Application 17/00887/PPP was dismissed by the Reporter. The Reporter found that development would constitute an inappropriate and unjustified development in the Green belt and a material change to the character and function of the Green Belt around the boundary of Condorrat.

Rossco Properties Ltd (211) - The Council does not agree that the Map Book should identify individual planning permissions and waste licences. Should any changes take place to the terms or status of any waste licence, the document would immediately be rendered out-of-date and irrelevant.

Wallace Land Investments (220) - The Council considers that the matters raised are addressed under Issue 04 PROM LOC 3 Housing Development Sites. There is no need to release this land in Airdrie/Coatbridge Housing Sub-Market Area for housing development within such close proximity to South Cumbernauld Community Growth Area.

Taylor Wimpey (225.3060, (225.300), (225.306); Cleland Ltd (241) - The Area Strategies serve as lists of Existing and Proposed Development Sites and the consequent areas, and capacities.

Miller Homes (259) - This is a new site promoted through the Modified Proposed Plan, so has not been subject to any previous assessment. The Council considers that the proposal would have a significant effect on the open character of the area and the function of the remaining Green Belt to act as a buffer between Bargeddie and Coatbridge. Furthermore, the matters raised relating to the Housing Land Supply and PROM LOC 3 are addressed under Issue 04 PROM LOC 3 Housing Development Sites.

Trustees of the Douglas Support Estate (260) - This is a new site promoted through the Modified Proposed Plan, so has not been subject to any previous assessment. The objection in relation to its promotion as a Strategic Business Centre is addressed under Issue 03 PROM LOC 2 Business Development Sites.

In terms of housing, the site is located within Ward 15, where no need for additional

housing was identified in the Housing Need & Demand Assessment. The Council feels that the location of the land isolated between two major roads, the M8 and A8, is wholly inappropriate for housing and should remain as designated Green Belt.

Woodlands Trust Scotland (293) - Existing Housing Development Site NLMK1190 has the benefit of planning permission, having been granted for Planning Applications 18/00279/AMD and 18/01326/MSC. As such, the objections raised in respect of this site are no longer a Development Plan matter, but for the Development Management process to take account of and resolve. Proposed Housing Development Site 01/10 Sweethill Terrace/Deanston Place, Carnbroe, is potentially misleading to the eye. From the outside, particularly from Carnbroe Road, it looks like a dense patch of mature woodland, but once penetrated it quickly becomes clear that the site is severely affected by its former industrial past, in the form of piles of bricks, wall sections, dips and gullies. The matters raised in the objection can be resolved through the Action Programme and the determination of any subsequent planning application. The Action Programme/ Development Management process is also the appropriate mechanism for dealing with any concerns regarding the development of Proposed Housing Development Site 06/09 Former Drumpark School, Bargeddie, and Proposed Business Development Site 02/10 Carnbroe, Coatbridge. As such, their allocations as Existing Housing Development Site, Proposed Housing Development Sites and Proposed Business Development site are appropriate. It is worth stressing that the Ancient Woodland Inventory, Native Woodland Survey of Scotland and mapping thereof are Scottish Government datasets outwith the control of the Council.

Reporter's conclusions:

Land at North Myvot Farm

1. The representation relating to this site is addressed in issue 4.

Energy from waste site at Carnbroe, Coatbridge

2. Representation 211 relates to the energy from waste site at Carnbroe, Coatbridge. On page 9.4 of the proposals maps in the current, adopted local plan, I note that the representation site is designated as an existing industrial and business area. Superimposed on the site is "W". This denotes "Industrial and Business Areas - Existing Waste Management Facilities".

3. In the proposed plan, site NLC00527 has a boundary similar to that of the representation site. It is designated "existing business site". The legend for the proposals map in the proposed plan does not include any special designation for waste management facilities. On page 111 of the proposed plan, there is reference to "Carnbroe (Energy from Waste)" as a site that may have potential to act as a heat source in wider heat networks.

4. Page 19 of the proposed plan includes: "Waste management facilities are supported, particularly where there is the potential in industrial areas, to support the use of excess heat in energy production …..".

5. I find that the proposed plan acknowledges the site at Carnbroe as an acceptable location for energy from waste development. The plan also indicates support for energy from waste facilities in industrial areas in general. From these considerations, I find no particular advantage in making the change sought in the representation.

6. In addition, in the interests of consistency, consideration would have to be given to whether other sites in North Lanarkshire would also qualify for the same designation as that which is sought for the Carnbroe site.

7. My conclusion is that the proposed plan need not be altered.

Land at Cumbernauld South West

8. This representation relating to this site is addressed in issue 4.

Whitehill Farm, Stepps

9. Representation 225-300 (Whitehill Farm, Stepps) is addressed in issue 17 Green Belt – Purpose of Place.

Branchal Road, Cambusnethan

10. Representation 225-283 (Branchal Road, Cambusnethan) is addressed in issue 17.

Meldrum Mains, Glenmavis

11. Representation 225-306 (Meldrum Mains, Glenmavis) is addressed in issue 4 Housing Development Sites.

Representation 241

12. This representation objects to the Coatbridge LAP section of the proposed plan. The representation gives neither grounds for objection nor details of how the proposed plan should be altered. The supporting document shows a site at Bellside, Cleland. This site is in the Wishaw Local Area Partnership. It appears that the objection may have been submitted in error. In any event, lack of information means that it is not possible to consider recommending any change to the proposed plan.

Land at Ryefields, Glasgow Road, Drumpellier

13. Representation 259 relates to land at Ryefields, Glasgow Road, Drumpellier. So far as I am aware, the representation site is not included in the Main Issues Report, has not been the subject of public consultation and has not been subject to strategic environmental assessment. Paragraph 118 of Circular 6/2013: Development Planning says:

> "Reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites."

In the circumstances, it would not be appropriate to recommend altering the proposed plan in response to the representation.

Land at Midshawhead, Coatbridge

14. Representation 260 (land at Midshawhead, Coatbridge) is addressed in issue 3

Business Development Sites.

Ancient and native woodland

15. Representation 293 refers to four locations – the site of the former Drumpark School at Bargeddie, Sweethill Terrace/Deanston Place, Carnbroe, land south of Carnbroe and a former landfill site at Carnbroe.

16. During my inspection of the Drumpark School site, I noted the presence of trees around most of the periphery of the site. There were no other trees within the site. I note that there is a tree preservation order for trees on the site.

17. Bearing in mind that most of the site is clear of trees and that trees on the periphery are subject to a preservation order, I find the woodland interest to be adequately safeguarded. There is no need to alter the proposed plan.

18. In the proposed plan, the Sweethill Terrace/Deanston Place site (site 01/10) is a proposed housing development site with an area of 2.21 hectares and a capacity for 55 dwellings. From my site inspection, I note that there is a dense deciduous woodland on the site. The trees have a fairly uniform height of about seven metres. Many are birch. They give the appearance of having been self-seeded about twenty years ago. Ground within the site is extremely uneven, as pointed out by the council.

19. Scottish Planning Policy says that the planning system should “protect and enhance ancient semi-natural woodland as an important and irreplaceable resource, together with other native or long-established woods, hedgerows and individual trees with high nature conservation or landscape value” (paragraph 194).

20. Site 01/10 contains a native wood. The protection and enhancement required by Scottish Planning Policy applies to native woods with high nature conservation or landscape value. I have no doubt that the woodland on site 01/10 has some nature conservation and landscape value, but I have no evidence that would allow me to conclude that this value is “high”.

21. Ground conditions within the wood demonstrate a site that was never properly rehabilitated following cessation of its previous use. If left long enough, a point might be reached at which the woodland on the site is so well-established that its value as woodland outweighs the unsatisfactory condition of the ground surface. I find that this point has not yet been reached. The balance of advantage lies with a redevelopment of the site which incorporates proper rehabilitation of the ground surface.

22. At paragraph 218, Scottish Planning Policy includes “Where woodland is removed in association with development, developers will generally be expected to provide compensatory planting”. With this in mind, I would expect the council to give particular attention to the desirability of requiring tree planting as part of any proposals for new development on the site.

23. My conclusion is that the proposed plan need not be altered with regard to site 01/10.

24. The land south of Carnbroe (site NLMK1190) is listed in the proposed plan as an existing housing development site with an area of 22.65 hectares and a capacity for 566 dwellings. I note that planning permission has been granted for development on this site.

During my site inspection, I noted that houses were under construction. In view of this commitment to development, I find that it would not be appropriate to remove site NLMK1190 from the proposed plan.

25. In the proposed plan, the former landfill site at Carnbroe (site 2/10) is a proposed business site with an area of 12.23 hectares. The LDP Protect Map on page 9.4 of the Map Book shows an area designated as "Site of Importance for Nature Conservation, Local Nature Reserve, Community Park etc" along the valley of the North Calder Water. Parts of this designation extend on to site 2/10.

26. I note that representation 293 does not seek any alteration to the boundary of site 2/10. The representation asks that development be located away from the woodland area. The council does not dispute the desirability of what is requested. The council refers to the action programme and to the development management process.

27. So far as I am aware, the action programme is not part of the proposed plan and is thus outwith the scope of this examination. For these reasons, I attach no weight to it. Regarding the development management process, this is strongly influenced by the content of the development plan that is for the time being in force. I note that the proposed plan's policy PROT A, under Category A3 Local Sites, refers to avoiding or mitigating adverse impacts on local sites.

28. I find that a relatively small part of site 2/10 contains a portion of the natural asset which is shown on the LDP Protect Map at page 9.4 and which is of concern to the representor. I find that it should be possible to develop most of the site without damaging the asset.

29. Scottish Planning Policy (paragraph 216) says that ancient semi-natural woodland is an irreplaceable resource that should be protected from adverse impacts resulting from development. I would expect this to be borne in mind in conjunction with the Protecting Assets policy when any proposal for development on site 2/10 is under consideration. I find that the part of the asset that is within site 2/10 should at all times be protected from development. This would still leave most of the site available for development.

30. My conclusion is that there is no need to alter the proposed plan in response to this part of representation 293.

Reporter's recommendation:

No modifications required.

Issue 029	**Cumbernauld & Kilsyth Local Area Partnership**	
Development plan reference:	Area Strategies Pages 112 - 117	**Reporter:** Robert Maslin
Body or person(s) submitting a representation raising the issue (including reference number):		
Ogilvie Homes (188) Delta Westerwood Property Ltd (191) Walker Group (Scotland) Ltd (192) Hallam Land Management (209) Jennifer McKinnell (232) Kapital Residential Ltd (234) Scottish Natural Heritage (SNH) (272) Scoop Asset Management (290) Woodend Farm (292)		
Provision of the Development Plan to which the issue relates:	Area Strategies – Cumbernauld & Kilsyth Local Area Partnership This extract shows what the Plan means for the Cumbernauld & Kilsyth Local Area Partnership area, giving information on the number of each different type of centre and details of sites currently in the land supplies, sites proposed through the Plan, Special Protection Area, Town Centre Action Plans, Green Network improvement opportunities, transportation projects, potential Heat Energy Network sources and Locality Plans in the area. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		
Ogilvie Homes (188.235) and supporting documents RD18-RD26, objects to the removal of CfS/MIR Site 0009/02 Westerwood Golf Club, Cumbernauld (SM031), which had been in the original Proposed Plan. Ogilvie Homes (188.237) and supporting documents RD27-RD33 and Ogilvie Homes (188.238) and supporting documents RD34-RD40, object to the non-allocation of CfS/MIR Sites 0007/02 and 0008/02 Sites A (SM032) and B (SM033) Dunning Drive, Cumbernauld, from the list of Proposed Housing Development Sites within the Local Area Partnership. Delta Westerwood Property Ltd (191) and supporting documents RD46-RD51, objects to the non-allocation of CfS/MIR Site 0004/02 West of Westerwood, Cumbernauld (SM051), for housing on the basis that further housing allocations are required and the site scores better than a number of sites which are Proposed Housing Development Sites in the Modified Proposed LDP. Walker Group (Scotland) Ltd (192) objects to site designation within the Green Belt on the basis the Council has not undertaken a proper Green Belt assessment. Hallam Land Management (209) and supporting documents RD80-81, objects to the designation of land at Dullatur Golf Course (SM007) as Green Belt on the basis that the site should be allocated for housing.		

Jennifer McKinnell (232) objects to Proposed Housing Development Site 10/01P for 50 houses to the rear of Lammerknowes Road, Banton (Mapbook 3.4). A better alternative for housing is along the village access road.

Kapital Residential Ltd (234) and supporting documents RD196-197, objects to the lack of sufficient land for housing development, particularly for low-cost, affordable housing.

SNH (272) objects to Existing Housing Development Sites NLCNO490A Cumbernauld CGA (Palacerigg) (Mapbook 5.5) and NLCNO490B Cumbernauld CGA (Mid – Forrest) (Mapbook 5.5), until an agreed mitigation plan is provided within the Local Development Plan. Both sites have been identified as those which could have a likely significant effect on the Slammanan Plateau Special Protection Area (SPA).

Scoop Asset Management (290) objects to the identification of Westway as a Town and Large Centre under Policy PP 1B.

Woodend Farm (292) and supporting document RD251, objects to land surrounding Woodend Farm, Kilsyth (SM042), being designated as within the Green Belt. The land should be identified as a development opportunity for both housing, and tourism & recreation on the basis of a perceived shortfall of sites to meet a 5-year effective supply of land for housing and the potential housing cross funding of the creation of a tourism and recreation hub adjoining Antonine Wall and the Forth & Clyde Canal.

Modifications sought by those submitting representations:

Ogilvie Homes (188.235); (188.237) and (188.238) seeks the allocation of CfS/MIR Sites 0007/02 (SM032), 0008/02 (SM033) and 0009/02 (SM031) as Proposed Housing Development Sites.

Delta Westerwood Property Ltd (191) seeks the removal of CfS/MIR Site 0004/02 (SM051) from the Green Belt and its allocation it as a Proposed Housing Development Site, with a capacity for some 90 units.

Walker Group (Scotland) Ltd (192) seeks the removal the Green Belt designation around Westerwood, Cumbernauld.

Hallam Land Management (209) seeks the removal of land at Dullatur Golf Course (SM007) from Green Belt and its allocation as a Proposed Housing Development Site.

Jennifer McKinnell (232) seeks the removal of Proposed Housing Development Site 10/01P (Mapbook 3.4) and its reinstatement as Green Belt.

Kapital Residential Ltd (234) seeks the allocation of CfS/MIR Site 0010/06 + for housing development in the Auchenkilns area, specifically land at South Myvot extending to approximately 15 acres (*sic*) (SM014 and SM015).

Scottish Natural Heritage (272) recommends that the following caveats be inserted into the Plan within the Area Strategy for Cumbernauld & Kilsyth.

1. Under Existing housing development sites (p. 115 of the Plan):

- An asterix (*sic*) * be added to the end of the allocations NLCNO490A

Cumbernauld CGA
(Palacerigg) (Mapbook 5.5) & NLCNO490B Cumbernauld CGA (Mid- Forrest) (Mapbook 5.5)

- A footnote be inserted at the bottom of the page to read:

**Any development proposals must take Policy PROT A Category A1 into account and, to be in accordance with the Plan, comply with the requirements of the South Cumbernauld Community Growth Area Strategic Development Framework*.
2. For consistency, the wording in relation to the SPA on page 117 of the Plan should also be amended to read:

"*Any development proposals must take Policy PROT A Category A1 into account and, to be in accordance with the Plan, comply with the requirements of the South Cumbernauld Community Growth Area Strategic Development Framework*."

Scoop Asset Management (290) seeks the removal of Westway as a Town and Large Centre and its replacement as a "Commercial Centre' in the Sequential Approach.

Woodend Farm (292) seeks the allocation of the "60 acre" (*sic*) CfS/MIR Site 0011/01 (SM042) highlighted in pink on the attached deed plan as a Proposed Housing Development site within the Cumbernauld & Kilsyth LAP with an indicative capacity of 250-300 houses and the "60 acre" (*sic*) site highlighted in blue and green on the attached deed plan (RD251) as a Proposed Regeneration Site within the Cumbernauld & Kilsyth LAP, with potential for tourism and leisure.

Summary of response by planning authority:

Ogilvie Homes (188.235) CfS/MIR Site 0009/02 (SM031) was allocated in North Lanarkshire Local Development Plan Proposed Plan in 2017 solely as a result of a review of settlement boundaries. The Council is clear that there is no need to release land for housing in Westerwood. The Council's decision to remove it from the Modified Proposed Plan reflects the lack of need. The following, as shown in AD72, expressed support for the Council's retention of the Green Belt status of various sites at Westerwood, Cumbernauld, and their non-allocation as Proposed Housing Development Sites: Michael and Janice Muir (236), Mr & Mrs Coats (240), Linda Bellingham (241), A Williams (242), Jim Barton (243), Westerwood Community Council (244), Sheila Scobbie (245), Alison Lunn (248), Kenneth William (352)

Ogilvie Homes (188.237) and (188.238) - The Council maintains that sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that this does not represent a sustainable location for any further release.

Delta Westerwood Property Ltd (191) - The Council considers that the matters raised are addressed under Issue 04 PROM LOC 3 Housing Development Sites and Issue 17 PP 4 Green Belt. The Council maintains that sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that this does not represent a sustainable location justification for any further release. The Council clearly states that sites in this ward were not subject to any assessment using the Sustainability and Deliverability Matrix, as there was no need for additional sites to be allocated.

Walker Group (Scotland) Ltd (192) The Council considers that the matters raised are addressed under Issue 04 PROM LOC 3 Housing Development Sites and Issue 17 PP 4

Green Belt. The Council maintains that sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that this does not represent a sustainable location justification for any further release.

Hallam Land Management (209) - The principle of removing the current Green Belt designation at this location is dealt with under Issue 17 PP 4 Green Belt. The Council maintains that sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that this does not represent a sustainable location justification for any further release.

Jennifer McKinnell (232) - The site was allocated as a Proposed Housing Development Site following a review of the urban boundaries of all North Lanarkshire settlements to ensure that they are robust and defensible in line with Scottish Planning Policy (AD60). The Council is of the view that the allocation for 50 units is not an overdevelopment of the village and will support its future sustainability by providing more homes and families to support local services and facilities including the primary school. Issues such as the proposed development affecting the residential amenity, noise, pollution would be assessed and addressed, if necessary, through the Development Management process. The Council maintains that this site has been appropriately identified for development in principle and does not agree that it should be removed.

Kapital Residential Ltd (234) - The Council maintains that sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that this does not represent a sustainable location for any further release. The Council takes into account the identified requirement for affordable housing in the Cumbernauld Housing Sub-Market Area by the continued use and implementation of its Affordable Housing Policy (AD50).

SNH (272) - Planning permission 16/00698/PPP for residential development (in principle) with local retail/services and ancillary works including access roads, SUDs and landscaping at NLCNO490B Cumbernauld CGA (Mid-Forrest) (Mapbook 5.5) has been granted by the Council. Any potential impact on the Slammanan Plateau Special Protection Area, adjacent Sites of Importance for Nature Conservation and Scottish Wildlife Trust Reserve can be managed through conditions. Similarly, with regard to NLCNO490A South Cumbernauld Community Growth Area (Palacerigg) (Mapbook 5.5), the Council considers that any specific concerns can be dealt with through the Development Management process. Should the Reporter find it acceptable, the Council proposes to add SNH's suggested asterisks at page 115 alongside the Existing Housing Development Sites NLCNO490A and NLCNO490B, as well as the explanatory footnote to page 115 "*Any development proposals must take Policy PROT A Category A1 into account and, to be in accordance with the Plan, comply with the requirements of the South Cumbernauld Community Growth Area Strategic Development Framework." For consistency, the wording in relation to the SPA on page 117 of the Plan should also be amended to read "Any development proposals must take Policy PROT A Category A1 into account and, to be in accordance with the Plan, comply with the requirements of the South Cumbernauld Community Growth Area Strategic Development Framework."

Scoop Asset Management (290) - The Sequential Approach set out in the Modified Proposed Plan reflects the Approved Clydeplan Strategic Development Plan (AD59), under which context none of North Lanarkshire centres can be described as a "commercial centre". The Town and Large Centres are not just retail parks, they incorporate other uses, have more parking, open space, community uses, etc., and are

not just selling 'bulky goods'. The Council's Sequential Approach acknowledges the changing nature and function of retail parks.

Woodend Farm (292) - The Council considers that the matters raised are addressed under Issue 04 PROM LOC 3 Housing Development Sites and Issue 17 PP 4 Green Belt. The Council maintains that sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that this does not represent a sustainable location justification for any further release.

Reporter's conclusions:

Preliminary

1. In issue 4: Housing Development Sites we have found that, with the exception of the Airdrie and Coatbridge housing sub-market area, the proposed plan has identified sufficient land to meet the housing land requirements set by Clydeplan. Therefore, we have not given further consideration to the potential suitability of sites outwith the Airdrie and Coatbridge housing-sub-market area for potential allocation, despite the various requests to allocate sites set out in representations. This is because any such modifications would not be addressing an insufficiency in the proposed plan, and so would be beyond the scope of the examination.

2. I rely on our issue 4 conclusions on this matter. My site-specific conclusions below set out where other aspects of representations are addressed. I also deal with any wider matters relevant to this issue, which are not addressed elsewhere.

Settlement boundary at Westerwood Golf Club, Cumbernauld

3. Representation 188-235 is addressed in issue 16 General Urban Area.

Sites A and B, Dunning Drive and St Andrew's Drive, Cumbernauld

4. Representations 188-237 and 188-238 are addressed in issue 16.

Land West of Westerwood, Cumbernauld

5. Representation 191 (land west of Westerwood, Cumbernauld) is addressed in issue 4 Housing Development Sites.

No proper assessment of areas proposed for inclusion in the green belt

6. Representation 192 (no proper assessment of areas proposed for inclusion in the green belt) is addressed in issue 17 Green Belt - Purpose of Place.

Dullatur Golf Course, Cumbernauld

7. Representation 209 (Dullatur Golf Course, Cumbernauld) is addressed in issue 17.

Lammerknowes Road, Banton

8. Representation 232 (Lammerknowes Road, Banton) is addressed in issue 4.

Land at South Myvot, Auchenkilns (Chapelton Road, Condorrat)

9. Representation 234 (land at South Myvot, Auchenkilns (Chapelton Road, Condorrat)) is addressed in issue 17.

Palacerigg and Mid Forest, Cumbernauld

10. Representation 272 recommends that, on page 115 of the proposed plan, an asterisk be added to the end of the allocations NLCNO490A Cumbernauld CGA (Palacerigg) and NLCNO490B Cumbernauld CGA (Mid-Forrest) and a footnote be inserted at the bottom of the page to read:

> *Any development proposals must take Policy PROT A Category A1 into account and, to be in accordance with the Plan, comply with the requirements of the South Cumbernauld Community Growth Area Strategic Development Framework.

11. On page 117 of the proposed plan, the wording in the section headed Slammanan Plateau Special Protection Area should read:

> Any development proposals must take Policy PROT A Category A1 into account and, to be in accordance with the Plan, comply with the requirements of the South Cumbernauld Community Growth Area Strategic Development Framework.

12. The council agrees with these alterations.

13. I find that the alterations would add clarity to the proposed plan. The plan should be altered accordingly.

Westway Park, Cumbernauld

14. Representation 290 is addressed in issue 10 Strategic town centres – Purpose of Place.

Woodend Farm

15. Representation 292 is addressed in issue 17 Green Belt - Purpose of Place.

Reporter's recommendations:

1. On page 115 of the proposed plan, add an asterisk to the end of the allocations NLCNO490A Cumbernauld CGA (Palacerigg) and NLCNO490B Cumbernauld CGA (Mid-Forrest) and insert the following footnote at the bottom of the page:

> *Any development proposals must take Policy PROT A Category A1 into account and, to be in accordance with the Plan, comply with the requirements of the South Cumbernauld Community Growth Area Strategic Development Framework.

2. On page 117 of the proposed plan, the wording in the section headed Slammanan Plateau Special Protection Area should read:

> Any development proposals must take Policy PROT A Category A1 into account and, to be in accordance with the Plan, comply with the requirements of the South Cumbernauld Community Growth Area Strategic Development Framework.

Issue 030	**Motherwell Local Area Partnership**	
Development plan reference:	Area Strategies Pages 118 - 121	**Reporter:** Robert Maslin

Body or person(s) submitting a representation raising the issue (including reference number):

Paul Divers (153)
Geraldine Ward (162)
Lawrence Ward (163)
Dawn Homes (206)
Woodland Trust Scotland (293)

Provision of the Development Plan to which the issue relates:	Area Strategies – Motherwell Local Area Partnership This extract shows what the Plan means for the Motherwell Local Area Partnership area, giving information on the number of each different type of centre and details of sites currently in the land supplies, sites proposed through the Plan, Town Centre Action Plans, Green Network improvement opportunities, transportation projects, potential Heat Energy Network sources and Locality Plans in the area. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

Planning authority's summary of the representation(s):

Paul Divers (153); Geraldine Ward (162); Lawrence Ward (163) object to the allocation of Proposed Housing Development Site 06/17 at High Street, Newarthill (Mapbook 10.5), on the basis that the proposed development will impact on the environment, amenity, local wildlife, schools, sewage system, road safety and traffic congestion. In addition, there is no justification to review the urban boundary and for further erosion of the Green Belt at this location. Brownfield land should be prioritised before releasing Green Belt.

Dawn Homes (206.265) and supporting documents RD065 and RD066, objects to the designation of CfS/MIR Site 0001/19, former driving range, Dalziel Park, Cleland (SM052), within the Green Belt and its non-allocation as a Proposed Housing Development Site.

Woodland Trust Scotland (293) objects to the allocation of Proposed Housing Development Site 02/18 St Mathew's Primary School, Wishaw (Map Book 12.5), on the grounds that the site overlaps areas of ancient woodland and the potential loss of woodland and negative impacts due to edge effects (disturbance from development, fragmentation, pollution, etc).

Modifications sought by those submitting representations:

Paul Divers (153); Geraldine Ward (162); Lawrence Ward (163) seek the deletion of Proposed Housing Development Site 06/17 (Mapbook 10.5) from the Plan and its reinstatement as Green Belt or a green space.

Dawn Homes (206.265) seeks removal of site CFS 0001/19 (SM052) from the Green Belt and its allocation as a Proposed Housing Development Site.

Woodland Trust Scotland (293) seeks that there should be an appropriate buffer between the area of woodland and any development at Proposed Housing Development Site 02/18 St Mathew's Primary School, Wishaw (Map Book 12.5). The Woodlands Trust can advise on the appropriate size of buffer at the planning application stage, when further details about the development become available. The site allocation should be modified to not overlap the woodland and leave adequate distance from the development to the area of woodland.

Summary of response by planning authority:

Paul Divers (153); Geraldine Ward (162); Lawrence Ward (163) - The objection to the allocation of Land at High Street, Newarthill is addressed under Issue 34 Land at High Street, Newarthill. Concerns raised by the objectors would be assessed, if necessary, through the Development Management process. The Council maintains that this site has been appropriately identified for development and does not agree that it should be removed.

Whilst the spatial strategy states that priority should be given to urban renewal, it recognises that development demands will not be met by the re-use of brownfield land alone. The site was proposed to be released as a result of the urban boundary review process to establish a more robust and defensible settlement boundary and support the future sustainability of the village.

Dawn Homes (206.265) - The Council considers that the matters raised are addressed within Schedule 4 Issue 04 PROM LOC 3 Housing Development Sites and Issue 17 PP 4 Green Belt. The Council maintains that sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that this does not represent a sustainable location justification for any further release.

Woodland Trust Scotland (293) - By the contributor's own admission, the matters raised in objection to Proposed Housing Development Site 02/18 St Mathew's Primary School, Wishaw, can be resolved through the Action Programme (AD18) and the determination of any subsequent planning application. It is worth noting that it is the former, cleared site of St Mathew's Primary School, with the footplate of the school, playground and blaes pitch still apparent, on a large tree-free area. As such, its allocation as a Proposed Housing Development Site is appropriate.

Reporter's conclusions:

<u>Site at High Street, Newarthill</u>

1. Representations 153, 162 and 163 are addressed in issue 34: Land at High Street, Newarthill.

<u>Land at former driving range, Dalziel Park, Cleland</u>

2. Representation 206 seeks a housing development site designation for the site of the former driving range at Dalziel Park, Cleland. The site should not be designated as green belt.

3. With regard to housing development, in issue 4, we conclude that the modified proposed plan identifies housing sites in the Motherwell housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of Circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Motherwell housing market sub-area to ensure the plan is sufficient in regard to its provision of housing land.

4. With regard to the green belt designation, from my site inspection I note that the representation site is located immediately south of the Dalziel Park sports facilities. These include a number of playing pitches, a spectator stand and other ancillary buildings. To the east is a building complex containing the Dalziel Park Hotel and golf course club house. This complex is separated and screened from the site by a belt of mature trees. The Dalziel Park residential estate to the north-east is slightly further away and also screened by trees. To the south, the site adjoins part of the valley of the South Calder Water. The valley contains mature woodland. The woodland extends along a tributary valley on the west side of the site.

5. With reference to the representation site being vacant or derelict land, during my site inspection I saw what appeared to be some low-lying, overgrown and inconspicuous demolition material on the east edge of the site. Apart from this, the unkempt condition of most of the site appeared to be simply the result of lack of maintenance.

6. The representation site is within a part of the green belt that defines the east side of Motherwell and the south-east side of Carfin-Newarthill. Within this part of the green belt there is variety of land uses, including industrial development, a sports facility, woodland and a golf course. I find that the site makes a relatively modest but useful contribution to maintaining the predominantly open character of this part of the green belt which in turn provides the setting for the adjacent general urban areas. Protection of the setting of communities is one purpose of the green belt.

7. Another purpose of the green belt is to support regeneration. I note that the Ravenscraig Regeneration Area is a short distance to the west of the representation site. Maintaining the green belt in the surrounding area, including the representation site, helps to direct growth to Ravenscraig and other urban areas.

8. The representation refers to other matters, including public transport, community facilities and ground conditions. These matters are separate from whether the site should or should not be within the green belt.

9. My conclusion is that the site makes a positive contribution to the function of the green belt in this locality. I am satisfied that the green belt designation of the site is appropriate in these circumstances and in the context that there is no imperative to identify additional housing land in this area. The proposed plan need not be altered.

<u>Site of St Matthew's Primary School, Wishaw</u>

10. With regard to matters raised in representation 293, I issued a request for further information. The council responded on 20 January 2021. The representor commented on 29 January 2021.

11. From submissions and from my site inspection, I find that the woodland that exists

within the eastern part of proposed housing site 02/18 (LDP Promote Map 12.5) is worthy of retention and protection. The woodland covers a significant proportion of site 02/18, to the extent that the housing designation gives a misleading impression of the area that is envisaged for built development.

12. Proposed housing site 02/18, as depicted in the proposed plan, might be interpreted as endorsing built development over the entire site.

13. To avoid misunderstanding and make clear what is envisaged, I find that proposed housing site 02/18 should exclude the eastern woodland. The proposed plan should be altered accordingly.

14. The matter of ensuring an adequate buffer between built development and woodland is something that should be addressed at planning application stage.

Reporter's recommendation:

1. On page 12.5 of the LDP Promote Map, reduce the size of proposed housing site 02/18 so that it excludes the woodland within the eastern part of the site. The area to be excluded is the area within the proposed site that is shaded green on the plan accompanying the letter from North Lanarkshire Council dated 20 January 2021, sent in response to further information request 010, except for the narrow salient immediately south of the word "Path".

Issue 031	**Northern Corridor Local Area Partnership**	
Development plan reference:	Area Strategies Pages 122 - 126	**Reporter:** Robert Maslin

Body or person(s) submitting a representation raising the issue (including reference number):

Gerard Ward (173)
Fiona Heeps (174)
Elizabeth Ward (175)
Elizabeth Lamb (176)
Lynn McLardy (177)
Donald McLardy (178)
Gartcosh Tenants & Residents Association (179)
Gartcosh Tenants & Residents association (180)
Richard McNair (181)
Catherine McGinty (182)
Brian McGinty (183)
Vicki Thomas (184)
Northern Corridor Community Volunteers (185)
Helen McNair (186)
Manus O'Donnell (202)
University of Strathclyde (215)
Stewart Milne Homes (216)
Taylor Wimpey (225)
Upland Developments Ltd (226)
Robertson Homes (238)
CALA Homes (West) Ltd (244)
Springfield Properties Plc (247)
Miller Homes (258)
Barratt Homes West Scotland & CALA Homes (West) Ltd (264)
Auchinloch Community Council and Northern Corridor Community Forum (277)
Woodlands Trust Scotland (293)

Provision of the Development Plan to which the issue relates:	Area Strategies – Northern Corridor Local Area Partnership This extract shows what the Plan means for the Northern Corridor Local Area Partnership area, giving information on the number of each different type of centre and details of sites currently in the land supplies, sites proposed through the Plan, Green Network improvement opportunities, transportation projects and Locality Plans in the area. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

Planning authority's summary of the representation(s):

Gerard Ward (173); Fiona Heeps (174); Elizabeth Ward (175); Elizabeth Lamb (176); Lynn McLardy (177); Donald McLardy (178); Gartcosh Tenants & Residents Association (179); Gartcosh Tenants & Residents Association (180); Richard McNair (181); Catherine McGinty (182); Brian McGinty (183); Vicki Thomas (184) and Helen McNair (186) object to the amount of land allocated for development in the Northern Corridor, that it is not supported by either Clydeplan (AD59) or Scottish Planning Policy (AD60), and should be reduced, the Modified Proposed Local Development Plan does not allocate a suitable site for a new primary school in Gartcosh, and considers that there has been a lack of engagement with the community.

Those parts of Existing Housing Development Site NLSK04442A (Mapbook 7.3) identified as phases 6, 7, 8 and 9 on the Plan should not be considered for housing, but should be left as green space or made available for community use.

Northern Corridor Community Volunteers (185) objects on the grounds that future policy

should encompass the whole of the Northern Corridor, including Chryston/Muirhead and Stepps in Ward 5, which are also struggling with extreme infrastructure pressure as a consequence of the amount of new housing, not just Glenboig/Gartcosh and Moodiesburn and to the allocation of the Existing Housing Development Site NLSK1275 at Bellaville Grove, Chryston (Mapbook 7.3), on the grounds that it was added to the Modified Proposed Plan without public consultation, having been accepted by the Enterprise and Housing Committee as a site for addition to the Strategic Housing Investment Plan 2018/19 on 2nd November 2017 (AD73).

Manus O'Donnell (202) objects to a number of sites identified in Moodiesburn through North Lanarkshire Local Plan 2012 (9) and the Modified Proposed Plan (5) as non-effective.

University of Strathclyde (215) and supporting document RD113 and Miller Homes (258) and supporting documents RD218-220, object to the designation of CfS/MIR Site 0002/05, Dorlin Road, Stepps (SM041), in the Green Belt, and its non-allocation as a Proposed Housing Development Site on the grounds of a perceived shortfall of identified housing land supply.

Stewart Milne Homes (216.313) and supporting documents RD119-123, objects to the non-allocation of CfS/MIR Site 0020/05, Burnbrae Road, Auchinloch (SM039), as a Proposed Housing Development Site.

Taylor Wimpey (225.300) and supporting documents RD157-158, objects to the non-allocation of CfS/MIR Sites 0011/05 and 0012/05, Whitehill Farm, Stepps (SM020), as Proposed Housing Development Sites, on the grounds that insufficient sites are allocated to meet need.

Upland Developments Ltd (226) and supporting documents RD159-160, objects to the non-allocation of CfS/MIR Site 0007/05, Cumbernauld Road/Woodhead Road, Muirhead (SM030), as a Proposed Housing Development Site for the development of a modern retirement village. Despite the North Lanarkshire Local Plan Examination Report of Examination conclusion that the site would represent a significant and unjustifiable westward expansion of Muirhead towards Stepps into the Green Belt, allocating the site will not automatically or inevitably result in coalescence of the neighbouring settlements, as planning controls and powers can be applied to prevent this. In addition, there is a need for specialist housing provision of this kind for elderly residents in the Moodiesburn area that has become more apparent since the Local Plan Examination and Adoption. This development could contribute to meeting that demand.

Robertson Homes (238) and supporting document RD RD200, objects to the non-allocation of CfS/MIR Site 0017/05, Land East of Stepps Road, Auchinloch (SM045), as a Proposed Housing Development Site.

CALA Homes (West) Ltd (244) and supporting documents RD205-208, objects to the omission of CfS/MIR Site 0027/05, Gartferry Road, Chryston (SM053), as a Proposed Housing Development Site.

Springfield Properties Plc (247) and supporting document RD211, objects to the omission of CfS/MIR Site 0038/05, Bedlay Estate, Chryston (SM054), as a Proposed Housing Development Site and its designation Under Policy PP4 Green Belt on the grounds that the site does not make a significant contribution to Green Belt objectives.

Barratt Homes West Scotland & CALA Homes (West) Ltd (264) and supporting documents RD228-234, objects to the non-allocation of CfS/MIR Site 0014/05, at Garnkirk Estate, Stepps (SM055), as a Proposed Housing Development Site on the grounds of a perceived shortfall in the five year effective housing land supply and the Council's approach to site selection being based on the assumption that the housing land requirements have been met.

Auchinloch Community Council and Northern Corridor Community Forum (277) objects to the inclusion of four housing development sites through the Urban Boundaries Review, but supports the removal of all of the sites submitted in the Northern Corridor from the assessment process due to the Housing Need & Demand Assessment there identifying that there is no need for additional housing there.

Woodlands Trust Scotland (293) objects to the Transport Improvement Area, identified in the Northern Corridor Area, north of Existing Housing Development Site NLSK1258 Hornshill Farm Road, Stepps (Map Book 7.32), on the grounds that there are concerns that the southern part of the site overlaps an area of ancient woodland.

Modifications sought by those submitting representations:

Gerard Ward (173) seeks the improvement of infrastructure and amenities before building additional housing.

Fiona Heeps (174) did not offer any sought modification.

Elizabeth Ward (175); Elizabeth Lamb (176) seek the reduction of the amount of land allocated.

Lynn McLardy (177); Donald McLardy (178); Gartcosh Tenants & Residents Association (179); Gartcosh Tenants & Residents Association (180); Richard McNair (181); Catherine McGinty (182); Brian McGinty (183); Vicki Thomas (184) and Helen McNair (186) seek the reduction of the amount of land allocated for development, the retention of those parts of NLSK0442A (Mapbook 7.3) identified as Phases 6, 7, 8 and 9 on the plan as green space or available for community use and the allocation of the playing fields that form part of NLSK0442A as a site for the new primary school.

Northern Corridor Community Volunteers (185) seek to ensure that comment/provision regarding infrastructure, including roads, traffic, education, air quality, etc., is made to villages in Ward 5 as well as those in Ward 6 and the removal)of Existing Housing Development Site NLSK1275, Bellaville Grove, Chryston (Mapbook 7.3), until correct procedures have been followed.

Manus O'Donnell (202) seeks the allocation of CfS/MIR Site 0001/05 East of Stoneyetts, Gartferry Road (SM056), as a Proposed Housing Development Site, the modification of the allocated unit numbers in this Plan in line with the most recent Housing Land Audit, recognition of the reliance on sites allocated 5+ years ago and how long they have taken to deliver by making provision for additional housing sites in this Local Area Partnership and the remainder of Glenboig/Gartcosh not being deliverable, or effective, 10 years on, the removal of the section on Locality/Community Plans for this Local Area Partnership and the recognition of Moodiesburn as an area of sustainable growth.

University of Strathclyde (215); Miller Homes (258) seek the allocation of CfS/MIR Site

0002/05 (SM041) as a Proposed Housing Development Site and its removal from the Green Belt.

Stewart Milne Homes (216.313) seeks the allocation of CfS/MIR Site 0020/05 (SM039) as a Proposed Housing Development Site.

Taylor Wimpey (225.300) seeks the allocation of CfS/MIR Sites 0011/05 and 0012/05 (SM020) as Proposed Housing Development Site(s).

Upland Developments Ltd (226) seeks the allocation of CfS/MIR Site 0007/05 (SM030) as a Proposed Housing Development Site, specifically for the development of a modern retirement village.

Robertson Homes (238) seeks the allocation of CfS/MIR Site 0017/05 (SM045) as a Proposed Housing Development Site.

CALA Homes (West) Ltd (244) seeks the allocation of CfS/MIR Site 0027/05 (SM053) as a Proposed Housing Development Site.

Springfield Properties Plc (247) seeks the allocation CfS/MIR Site 0038/05 (SM054) as a Proposed Housing Development Site.

Barratt Homes West Scotland & CALA Homes (West) Ltd (264) seeks the allocation of CfS/MIR Site 0014/05 (SM055) as a Proposed Housing Development Site and its removal of the site from the Green Belt.

Auchinloch Community Council and Northern Corridor Community Forum (277) seeks the transfer of all Glenboig sites listed under Coatbridge Local Area Partnership to the Northern Corridor Local Area Partnership and the removal of Proposed Housing Development Sites 04/05 (Mapbook 6.3), 10/05 (Mapbook 6.3), 29/05 (Mapbook 6.3) and 18/05 (Mapbook 6.2).

Woodlands Trust Scotland (293) seeks the exclusion of the ancient woodland area from the site allocation and the establishment of an appropriate buffer between the woodland area and the proposed development as part of the site-specific requirements. The Woodland Trust can advise on the appropriate size of the buffer at the planning application stage, when further details about the development become available.

Summary of response by planning authority:

Gerard Ward (173); Fiona Heeps (174); Elizabeth Ward (175); Elizabeth Lamb (176); Lynn McLardy (177); Donald McLardy (178); Gartcosh Tenants & Residents Association (179); Gartcosh Tenants & Residents Association (180); Richard McNair (181); Catherine McGinty (182); Brian McGinty (183); Vicki Thomas (184) and Helen McNair (186) - Existing Housing Site NLSK40442A Gartcosh, is part of the effective and established land supply as a consequence of Gartcosh & Glenboig Community Growth Area having been designated originally in the Glasgow & the Clyde Valley Joint Structure Plan Third Alteration 2006 (Approved May 2009) (continued in Clydeplan Strategic Development Plan Approved on 24 July 2017) (AD67) and subsequent Adopted North Lanarkshire Local Plan, the implementation of the Structure Plan. This attracted a significant number of objections to the Finalised Draft North Lanarkshire Local Plan. The Local Plan Examination began in October 2010 and the Report of Examination (AD53 & AD54)

published in January 2012. As a result, the allocations of land contained in the Local Plan as making up the Community Growth Area were confirmed. The concerns raised relate to the implementation of the Community Growth Area through the Development Management process. Gartcosh & Glenboig Community Growth Area is no longer a Local Development Plan matter.

Northern Corridor Community Volunteers (185) - The Council considers that the villages of Chryston, Muirhead and Stepps are all recognised settlements within the Northern Corridor LAP as found on page 122 of the Plan. Comments regarding the impact of new development on existing infrastructure will be addressed as part of any forthcoming planning application and subject to the Policies within the Plan, including PROM LOC 3, ID1 Policy Transport Improvements, Policy CI Contributions to Infrastructure and Environmental and Design Qualities Policies EDQ1/2/3.

With regard to the site at Bellaville Grove, Chryston (Mapbook 7.3), the Council considers that correct procedure has been implemented. The site was identified as a Strategic Housing Investment Plan (SHIP) site as part of the Council's Local Housing Strategy to support its objectives. As part of this process, Registered Social Landlords are invited to submit sites to be considered for inclusion within the new SHIP. Planning advice regarding site constraints and Plan Policy compatibility are taken into account and a duly constituted Committee of the Council gives its approval, with ultimately project approval from the Scottish Government. Planning Application 18/01580/FUL is pending consideration, being assessed against the relevant Policies in the Local Plan and supporting supplementary guidance, with an opportunity for anyone who wishes to make comments/objections regarding the proposed development.

Manus O'Donnell (202) - Once Adopted, the Local Development Plan will reflect the most recent agreed Housing Land Audit. The Council considers that Moodiesburn is an area for sustainable growth by the allocation of Proposed Housing Development Sites. No reason has been provided as to why the designation of Moodiesburn as a locality planning area should be removed.

University of Strathclyde (215); Miller Homes (258); Upland Developments Ltd (226); Taylor Wimpey (225.300); Robertson Homes (238); Stewart Milne Homes (216.313); CALA Homes (West) Ltd (244); Springfield Properties Plc (247) and Barratt Homes West Scotland & CALA Homes (West) Ltd (264) - The Council considers that the matters raised are addressed under Issue 04 PROM LOC 3 Housing Development Sites and Issue 17 PP 4 Green Belt. The Council maintains that sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that these do not represent sustainable locations for any further release.

Auchinloch Community Council and Northern Corridor Community Forum (277) - The composition of the Local Area Partnership Areas is one of internal corporate administration and not a Development Plan matter. In any case, Glenboig is traditionally considered to be a "Coatbridge Village", with secondary school aged children travelling to secondary schools in Coatbridge and the sharing of the post code prefix ML5. The purpose of the Urban Boundaries Review (AD27) was to address boundary anomalies in the North Lanarkshire Local Plan (2012) and those which have been identified since its publication, in order to ensure robust, defensible and sustainable urban boundaries are established in the emerging LDP. In the case of Proposed Housing Development Site 18/05 (Mapbook 6.2), the small parcel of land sits between a new housing development site (NLCN1045) and the B757. The Council considers that the road is a clearly

identifiable and defensible boundary and, as such, the settlement boundary can be drawn to its edge. The parcel of land then forms a small site that may have potential for limited development should an application be forthcoming. Detailed matters relating to design, layout, capacity, boundary treatment and access would require to be assessed through the Development Management process.

The three other Proposed Housing Development Sites objected to were proposed to be released as a result of the Urban Boundary Review process to establish robust and defensible settlement boundaries. Proposed Housing Development Sites 04/05 (Mapbook 6.3)and 10/05 (Mapbook 6.3) were rendered untenable as Green Belt as a result of the North Lanarkshire Local Plan Report of Examination, which left them as small, detached enclaves surrounded by housing allocations.

Proposed Housing Development Site 29/05 (only a small part of CfS/MIR Site 0029/05) was rendered untenable as Green Belt as a result of the North Lanarkshire Local Plan Report of Examination (AD53 & AD54), which left it as a narrow salient between a housing allocation and the Reporter's recommendation that the neighbouring concrete block manufacturing plant could no longer be designated as Green Belt.

The Council maintains that these sites have been appropriately identified for development in principle, with robust, defensible boundaries and does not agree that they should be removed.

Woodlands Trust Scotland (293) - As stated at Issue 06, North Lanarkshire Local Plan Report of Examination Part 2 (AD54) page 223 – 225 recommended that this site be removed from the Green Belt and designated as a Motorway Service Area. The Modified Proposed Plan's Transport Improvement Area recognition continues to reflect this and its implementation is no longer a Development Plan matter. By the contributor's own admission, the matters raised in objection to the Transport Improvement Area can be resolved through the determination of any subsequent planning application.

Reporter's conclusions:

Amount of land allocated for development in the Northern Corridor, with particular reference to Gartcosh

1. One of the concerns expressed in representations 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184 and 186 is that the proposed plan allocates too much land for new housing developments. Housing land supply is addressed in issue 4: Housing Development Sites. In connection with issue 4, a request for further information was issued. The council responded to this request and in turn interested parties commented on the council's response. Among those making comments was Gartcosh Tenants and Residents Association. Some of the Association's comments were of a site-specific nature, making reference to the community growth area sites at Gartcosh. These comments are taken into account in the following conclusions.

2. Considerable concern is expressed about recent residential development in Gartcosh. Reasons for this include the following. Development has not been supported by improved amenities and infrastructure. A752 is congested. A new primary school is needed. There has been no meaningful public consultation regarding possible sites for the new school. The 1903 community hall is no longer adequate. There is lack of accessible green space in and around the village. Development close to Johnston Loch

is driving out wildlife. The loch and its surroundings should be left as an open space. The amount of proposed development would have an intrusive visual impact. There would be coalescence with Muirhead/Chryston. The proposed local development plan should be altered to include: open space retained around Johnston Loch; the playing field site that forms part of NLSK0442A allocated for a new primary school; green space for community use; and measures to make good lack of road capacity. The proposed plan understates the number of new dwellings that could be built. Lack of progress since the current adopted local plan came into force demonstrates that sites proposed for new housing are not effective.

3. I note what the council says about the history of the Gartcosh and Glenboig Community Growth Area. The community growth area is a component of Clydeplan, the current strategic development plan. It is a legal requirement that the proposed local development plan is consistent with Clydeplan.

4. The council's current adopted local plan was subject to examination. In the examination report, issue 15.3 addressed the Gartcosh and Glenboig Community Growth Area. It acknowledged that Johnston Loch is an important landscape feature, but it did not conclude that this required a reduction in the proposed area for development. It noted that, with the need to accommodate approximately 3,000 dwellings, a degree of coalescence was inevitable but would not be to an extent that was harmful.

5. I note that the proposed plan does not identify any new land for housing at Gartcosh. All the housing sites are "existing". In other words, they are the sites that are identified in the existing adopted local plan.

6. I find that the amount of new residential development envisaged for Gartcosh is such that at least one new primary school will be required. The current, adopted local plan does not identify any specific site for a new school. In this respect, the proposed plan is the same. A site, or sites, could be identified as part of any master-planning exercise or in conjunction with proposals put forward in applications for planning permission, with opportunity for public comment. Open space and road improvements could be identified in a similar manner. Regarding traffic congestion, it is open to the council to secure any road improvements that might be needed to make new development acceptable.

7. Regarding numbers of dwellings, the glossary of the proposed plan defines "capacity" as the estimated amount of development a site can reasonably accommodate. Thus, site capacity figures in the plan should not be taken as dictating the exact number of dwellings that are to be built If there were clear reasons why the number of dwellings to be built on a particular site or group of sites should not exceed a specified number, I would expect this to be stated in the plan. Submissions do not demonstrate that new dwellings at Gartcosh should be limited to a specified amount.

8. Regarding effectiveness, the key test is whether a site is likely to deliver the planned development within the plan period. Lack of building activity in the past does not necessarily mean that this will continue to be the case in the future. Concern about overdevelopment suggests that there is now, if not previously, interest in continuing with new housing development at Gartcosh.

9. My conclusion is that the principle of major development at Gartcosh is already established. Representations do not demonstrate any change in circumstances or provide any significant new information that would justify modification of what is shown in

the proposed plan. The plan need not be altered.

Site at Bellaville Grove, Chryston

10. With regard to matters raised in representation 185, I issued a request for further information. The council's reply dated 21 January 2021 includes the following information. The Bellaville Grove site was not included in the Main Issues Report. The site came through the 2018 Strategic Housing Investment Programme. When the Strategic Housing Investment Programme was submitted to the council, it was reported that the Bellaville Grove site had been subjected to Strategic Environmental Assessment. No major issues of relevance had been identified.

11. The representation says that the Bellaville Grove site has been added to the proposed plan without proper and rigorous adherence to planning policies. The representation does not specify the policies in question and does not say in what way there has been a failure to adhere to them. Without this information, I am unable to consider whether there has been any error or omission on the part of the council.

12. The representation says that the Bellaville Grove site was included in the Strategic Housing Investment Programme without public consultation. I find that preparation of the council's Strategic Housing Investment Programme is a matter that is outwith the scope of this examination.

13. The representation asserts that local residents have not been consulted on the addition of the Bellaville Grove site to the proposed plan. I find that when the proposed plan in its current form was published, there was opportunity for local residents to submit representations.

14. My conclusion is that, in response to representation 185, the proposed plan need not be altered.

No mention of Chryston/Muirhead or Stepps

15. Representation 185 says that, in relation to villages in ward 5, the proposed plan should include comment or provision regarding infrastructure. This should include roads, traffic, education and air quality.

16. I note that, as indicated in the opening paragraph on page 122, the Northern Corridor Local Area Partnership part of the proposed plan is essentially a compendium of designations and proposals for locations and sites in the Northern Corridor. I take it that the lack of reference to Chryston, Muirhead and Stepps in the sections headed 'Transport improvements' and 'Locality Plans' is because initial analysis has not identified need for interventions over and above those that could, if they arise in response to applications for planning permission, be addressed by means of planning obligations or planning permission conditions.

17. The representation does not provide evidence to demonstrate a need to address specific problems relating to infrastructure, roads, schools and air quality. Without this, it is not possible to consider inclusion of these matters in the area strategy for the Northern Corridor Local Area Partnership.

18. My conclusion is that the proposed plan need not be altered.

Housing land supply in the Northern Corridor Local Area Partnership

19. Representation 202 seeks additional housing land in the Northern Corridor Local Area Partnership. Housing land supply, including questions of site capacity and site effectiveness, is addressed in issue 4: Housing Development Sites. Representations concerning the suitability of individual sites for housing development are considered elsewhere in this report.

20. The representation seeks inclusion of five additional sites. I note that no details of these sites are included in the representation. For this reason, it is not possible to give them further consideration.

Site East of Stoneyetts, Gartferry Road, Moodiesburn

21. The site boundary shown in representation 202 differs from that shown in the council's Site Map Booklet (site SM056). In reply to a request for further information (FIR 007), the council says that this difference does not alter its assessment of the representation.

22. Representation 202 seeks removal of the green belt designation of the site east of Stoneyetts at Moodiesburn. The site should be allocated for a development of up to 200 dwellings.

23. With regard to allocating the representation site for housing development, in issue 4, we conclude that the modified proposed plan identifies housing sites in the Cumbernauld housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of Circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Cumbernauld housing sub-market area to ensure the plan is sufficient in regard to its provision of housing land.

24. With regard to the green belt designation, the representation site is a part of the green belt that separates Moodiesburn and Cumbernauld. From my site inspection, I find that the built-up area of Moodiesburn is barely visible from Mollins Road on the south-west edge of the Westfield Industrial Area. Development on the representation site would be visible. It would have an adverse impact on the effectiveness of this part of the green belt. The presence of the M80 motorway does not diminish the importance of maintaining separation between Moodiesburn and Cumbernauld.

25. The representation refers to a number of matters, including compatibility with existing housing development, a planning application at Stoneyetts, availability of public transport and access. These matters are separate from whether the site should or should not be in the green belt.

26. My conclusion is that the site makes a positive contribution to the function of the green belt in this locality. I am satisfied that the green belt designation of the site is appropriate. In these circumstances and in the context that there is no imperative to identify additional housing land in this area, the proposed plan need not be altered.

Moodiesburn as a locality planning area

27. Representation 202 objects to Moodiesburn being identified as a locality planning area. Moodiesburn should be recognised as an area of sustainable growth.

28. I note that no reason is given for objecting to Moodiesburn being identified as a locality planning area.

29. Regarding sustainable growth, I note that the table on page 122 of the proposed plan indicates that Moodiesburn would have seven sites with a capacity for 1,151 dwellings. I find that this suggests that Moodiesburn is seen as a community that is capable of sustainable growth.

30. From the above considerations, I conclude that there is no need to alter the proposed plan.

Site at Dorlin Road, Stepps

31. Representations 215 and 258 relate to the site at Dorlin Road, Stepps. Representation 258 is also included in issue 17. All matters raised in representation 258 are taken into account here.

32. The representations object to the green belt designation of the Dorlin Road site. The site should be allocated for residential development. The site extends to about 15 hectares and could accommodate 300 to 350 dwellings. The representations include the following points. The proposed plan fails to identify sufficient land for new residential development. On three sides, the site is adjacent to existing residential development. The site makes no significant contribution to green belt objectives. There would be a strong and robust green belt boundary on the south side of the site. Access is available. Close by are Stepps and its facilities.

33. With regard to housing land supply, in issue 4 we conclude that the modified proposed plan identifies housing sites in the Cumbernauld housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of Circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Cumbernauld housing sub-market area to ensure the plan is sufficient in regard to its provision of housing land.

34. With regard to the green belt, the site provides a pleasant setting for and an open outlook from the adjacent urban area. During my inspection, I noted that the site was used by persons out walking.

35. The representations refer to a number of other matters, including access and availability of local facilities. These matters are separate from whether the site should or should not be in the green belt.

36. My conclusion is that the site makes a positive contribution to the function of the green belt in this locality. I am satisfied that the green belt designation of the site is appropriate. In these circumstances and in the context that there is no imperative to identify additional housing land in this area, the proposed plan need not be altered.

Site at Burnbrae Road, Auchinloch

37. In issue 4 Housing Development Sites, we have found that there is no basis for us to recommend the allocation of additional land for housing outwith the Airdrie and Coatbridge housing sub-market area. Consequently, no further consideration has been given to this site's suitability for housing, as it is located in the Cumbernauld housing sub-market area.

Site at Whitehill Farm, Stepps

38. Representation 225-300 is addressed in issue 17 Green Belt – Purpose of Place.

Site at Cumbernauld Road/Woodhead Road, Muirhead

39. Representation 226 is addressed in issue 17.

Land East of Stepps Road (South Broomknowes) Auchinloch

40. Representation 238 is addressed in issue 17.

Gartferry Road, Chryston

41. Representation 244 refers to a site on the north-west side of Chryston. The representation objects to the green belt designation of the site. The site should be identified as a proposed housing development site. The site is about 12.7 hectares in extent, with capacity for about 225 dwellings. Development on the representation site would be a logical extension to the settlement of Chryston.

42. In issue 4 we conclude that the modified proposed plan identifies housing sites in the Cumbernauld housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of Circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Cumbernauld housing sub-market area to ensure the plan is sufficient in regard to its provision of housing land.

43. With regard to the green belt, I note that, in the proposed plan, the representation site is within a part of the green belt that separates Chryston and Moodiesburn. In broad terms, there is a gap of about 500 metres between the two built-up areas. The Grayston Manor houses form a salient on the north-east side of Chryston, reducing the gap at this point to about 200 metres. The south-west side of Moodiesburn is very strongly defined by woodland along the Bothlin Burn.

44. The Indicative Development Framework shows a public open space alongside the east boundary of the site, adjacent to the Bothlin Burn woodland. Apart from the Bothlin Burn woodland thus augmented, development would fill the gap between Chryston and Moodiesburn.

45. The representation site is on ground that slopes down from the edge of the built-up area. The built-up area as seen from the north consists of a line of houses on the skyline and Chryston Parish Church. The church with its steeple is a prominent landmark. I find that, while the existing edge of the built-up area has a certain harshness, it is clear-cut. It

reflects local topography in that it is at a break in slope.

46. I find that the representation site is part of a relatively narrow corridor that separates Chryston and Moodiesburn. It contributes to local amenity as part of the setting of both communities. The existing green belt boundary in the vicinity is satisfactory.

47. My conclusion is that the site makes a positive contribution to the function of the green belt in this locality. I am satisfied that the green belt designation of the site is appropriate. In these circumstances and in the context that there is no imperative to identify additional housing land in this area, the proposed plan need not be altered.

Bedlay Estate, Chryston

48. In issue 4: Housing Development Sites, we have found that there is no basis for us to recommend the allocation of additional land for housing outwith the Airdrie and Coatbridge housing sub-market area. Consequently, no further consideration has been given to this site's suitability for housing, as it is located in the Cumbernauld housing sub-market area.

Garnkirk Estate, Stepps

49. Representation 264 says that the site at Garnkirk Estate, Stepps, should be removed from the green belt and allocated for housing. The site occupies land between Mount Harriet Drive and the M80. The site covers 34.4 hectares. It should be allocated for around 600 dwellings, along with associated open space, infrastructure, community facilities and a new primary school.

50. The representation says that additional housing land allocations are required to meet housing land requirements. Development would rationalise the urban form of the north-eastern edge of Stepps. It could improve the transition between the settlement and the countryside. The existing green belt boundary on the north side of Stepps is weak, being largely formed by rear garden fences. The proposed green belt boundary would be strong and robust.

51. I note that, in the current, adopted local plan, the north-east end of the site is identified for transport development. The remainder of the site is in the green belt. A strip of land along the Garnkirk Burn is identified as a site of importance for nature conservation. The proposed plan contains similar provisions.

52. With regard to housing land supply, in issue 4 we conclude that the modified proposed plan identifies housing sites in the Cumbernauld housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of Circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Cumbernauld housing market sub-area to ensure the plan is sufficient in regard to its provision of housing land.

53. With regard to the green belt, I do not accept that the green belt boundary on the north side of Stepps is weak. Most of this boundary where it adjoins the representation site is defined by Mount Harriet Drive and not by rear garden fences. Houses on the south side of Mount Harriet Drive face north, towards the green belt. There are trees

along the north edge of the road. As noted on page 7 of the Development Framework Report, the representation site "slopes upward to the south with a ridgeline formed along Mount Harriet Drive". I find that the ridgeline is a significant topographical feature and lends robustness to the green belt boundary. Combined with the outward-facing houses and element of tree-screening, I find that the green belt boundary is satisfactory.

54. During my site visit, I noted that, in general, the M80 carriageways are not visible from the representation site. Despite this, the whole site was pervaded by traffic noise. I note the reference to noise mitigation. It is not clear how effective this might be. As it is, I find that the green belt between the M80 and Mount Harriet Drive is of particular benefit to the setting of Stepps in that it acts as an area over which traffic noise is attenuated before the urban area is reached.

55. From the foregoing I find that the M80 would be a much less satisfactory green belt boundary than the existing boundary on the south side of the site.

56. I note the other matters raised in the representation. These matters are separate from whether the site should or should not be in the green belt.

57. My conclusion is that the site makes a positive contribution to the function of the green belt in this locality. I am satisfied that the green belt designation of the site is appropriate. In these circumstances and in the context that there is no imperative to identify additional housing land in this area, the proposed plan need not be altered.

Local area partnership boundary at Glenboig

58. Three Glenboig sites are included in the Coatbridge Local Area Partnership. Representation 277 seeks to have them moved to the Northern Corridor Area Partnership.

59. I note what the council says about local identity. I also note that the local area partnership boundaries are seen as administrative, with little or no planning significance. In the circumstances, I find no need to recommend any alteration to the proposed plan.

Sites at The Neuk, Auchinloch (18/05), Lanrigg Holdings, Chryston (04/05), Gartferry Road, Moodiesburn (10/05) and North of Gartferry Road, Moodiesburn (29/05)

60. Representation 277 (sites at The Neuk, Auchinloch (18/05), Lanrig Holdings, Chryston (04/05), Gartferry Road, Moodiesburn (10/05) and North of Gartferry Road, Moodiesburn (29/05)) is also recorded in issue 4. My conclusions here take into account the whole of the representation.

61. The site at The Neuk, Auchinloch is shown as site 18/05 on page 6.2 of the Map Book. Its south-east side adjoins Stepps Road (B757). Its east side adjoins a wooded area on the south side of the car park of the Golden Pheasant. To the north is the rear of properties on Langmuirhead Road. To the west is site NLCN1045, where housing development appears to be largely complete.

62. The representation says that there is no obvious means of site access for vehicular traffic. Its eastern boundary is a public right of way and its western boundary is the narrow and very busy B757.

63. From my inspection, I note that the existing access to the site is from Langmuirhead Road and appears to be somewhat narrow for use as an access to a housing development. Direct access from Stepps Road appears undesirable – visibility is likely to be substandard, the road has no footways and there may be no scope to provide a right-turning lane in the centre of the carriageway. Acceptable access might be possible from the development on site NLCN1045.

64. I see no reason why development on The Neuk should not maintain access along the pedestrian route across the site. If the route is indeed a public right of way, keeping it open would be obligatory.

65. Now that development has taken place on site NLCN1045, I find that The Neuk makes little or no contribution to the purposes of the green belt. Development on The Neuk would not cause any significant harm to the remainder of the green belt.

66. My conclusion is that, with respect to The Neuk, the proposed plan need not be altered.

67. Regarding the other three sites, the representation says that "there seems to be no appreciation of these (mainly) green spaces as contributing to the quality of the place, either actually or potentially."

68. The Lanrigg Holdings site is shown as site 04/05 on page 6.3 of the Map Book. It has existing residential development on its west and south boundaries. On its north and east boundaries, it adjoins site NLSK1046. During my site inspection, I noted that housing development on site NLSK1046 had progressed from the south end of the site to a point roughly in line with the south-east corner of site 04/05. Development was ongoing.

69. The Gartferry Road, Moodiesburn site is shown as site 10/05 on page 6.3 of the Map Book. On its south-west side, development on site NLSK1126 has taken place. It will be surrounded by residential development once site NLSK0441 to the north is developed.

70. The North of Gartferry Road, Moodiesburn site is shown as site 29/05 on page 6.3 of the Map Book. It has site NLSK1126 on its north-east side. On its south-east and south-west sides, it adjoins the general urban area.

71. I appreciate that retaining the foregoing three sites as open spaces could make a positive contribution to the amenity of their localities. On the other hand, I have no evidence to show that there is a shortage of open space in Chryston or Moodiesburn. In addition, it has not been shown that resources are available to acquire and maintain one or more of the sites as an open space.

72. In all the circumstances, I find that designating the sites as proposed housing sites is acceptable. The proposed plan need not be altered.

Amount of land allocated for development in the Northern Corridor, with particular reference to Stepps

73. Representation 280 is recorded in issue 4 Housing Development Sites. It expresses concern about the overall amount of development proposed in the Northern Corridor. It suggests that there should be no more housing development until cumulative impacts

have been assessed. It requests that no further land be allocated for development at Stepps. Causes of concern include the poor design of new housing and adverse effects on landscape, traffic, schools and wildlife.

74. It is a legal requirement that the proposed local development plan be consistent with Clydeplan. This includes need to continue to allocate land for housing in the community growth area at Gartcosh-Glenboig. The proposed plan identifies the community growth area sites and other existing housing development sites in the Northern Corridor, all with an estimated capacity for 4,037 dwellings. Four additional housing development sites are proposed, with a total capacity for 227 dwellings. Thus, a relatively modest amount of new housing land is being proposed. None of it is at Stepps.

75. Additional housing land at Stepps is put forward in several representations. We are not recommending that these representations be accepted.

76. Broad effects on landscape, traffic, schools and wildlife are matters that are taken into account during the plan preparation process. More localised effects may be considered at the planning application stage. Design of housing layouts and buildings is chiefly a matter for the planning application stage.

77. My conclusion is that, in response to the representation, the proposed plan need not be altered.

<u>Transportation Opportunity site at Hornshill, Stepps</u>

78. Representation 293 is addressed in issue 6 Transport Improvements.

Reporter's recommendations:

No modifications required.

Issue 032	**Wishaw Local Area Partnership**	
Development plan reference:	Area Strategies Pages 128 -132	**Reporter:** Robert Maslin

Body or person(s) submitting a representation raising the issue (including reference number):

Taylor Wimpey (225)
Barratt Homes (West) Scotland (231)
Sandra McCumisky (236)
Woodblane Developments Limited (240)
Central Scotland Green Network Trust (254)

Provision of the Development Plan to which the issue relates:	Area Strategies – Wishaw Local Area Partnership This extract shows what the Plan means for the Wishaw Local Area Partnership area, giving information on the number of each different type of centre and details of sites currently in the land supplies, sites proposed through the Plan, Town Centre Action Plans, Green Network improvement opportunities, transportation projects, and Locality Plans in the area. All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

Planning authority's summary of the representation(s):

Taylor Wimpey (225.283) and supporting documents RD152 and RD153, objects to the non-allocation of CfS/MIR Site 0006/19, Branchal Road, Cambusnethan (SM019), as a Proposed Housing Development Site, on the grounds that the South Wishaw Mini-Charrette and the level of engagement was limited, and the study boundary should have encompassed a wider area around the north of Wishaw.

Barratt Homes (West) Scotland (231.305) and supporting documents RD187-RD195, objects to the non-allocation of CfS/MIR Site 0014/19 , Wishaw High Road, Cleland (SM057), as a Proposed Housing Development Site, on the grounds that there is an identified shortfall in the five-year effective housing land supply. The site should be removed from the Green Belt and allocated for housing development.

Sandra McCumisky (236) objects on the grounds that the Modified Proposed Plan does not focus sufficiently on the regeneration of the inadequate Wishaw Town Centre.

Woodblane Developments Limited (240) and supporting document RD201, objects to the non-allocation of CfS/MIR Site 0019/12, Eastfield Strip, Harthill (SM024), as a Proposed Business Development site, on the grounds that there is significant housing to be built in Harthill, but limited local job opportunities exist.

Central Scotland Green Network Trust (254) and supporting documents RD213, RD214 and RD215, objects to settlement boundary and housing allocation for the Shotts area, specifically to the northern boundary, on the grounds that the proposed housing areas identified are limited in scope and scale and their development will impact upon limited greenspace.

Modifications sought by those submitting representations:

Taylor Wimpey (225.283) seeks the allocation of CfS/MIR Site 0006/19, Branchal Road, Cambusnethan (SM019), as a Proposed Housing Development Site.

Barratt Homes (West) Scotland (231.305) seeks the removal of CfS/MIR Site 0014/19, Wishaw High Road, Cleland (SM057), from the Green Belt and its allocation as a Proposed Housing Development Site.

Sandra McCumisky (236) seeks the regeneration of Wishaw Town Centre.

Woodblane Developments Limited (240) seeks the allocation of CfS/MIR Site 0019/12, Eastfield Strip, Harthill (SM024), as a Proposed Business Development Site.

Central Scotland Green Network Trust (254) seeks the amendment of the Shotts settlement boundary to include land as shown on the supporting document "*Hillhouseridge Requested Revision to LDP*" (RD0215) and the allocation of two Proposed Housing Development Sites shown on the appended plan "*Hillhouseridge Requested Revision to LDP*"(SM006).

Summary of response by planning authority:

Taylor Wimpey (225.283) - The Council considers that the matters raised are addressed within Issue 04 PROM LOC 3 Housing Development Sites and Issue 17 PP 4 Green Belt. The Council maintains that sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that this does not represent a sustainable location justification for any further release.

The Council maintains that it was wholly appropriate that the South Wishaw Mini-Charrette Study area be concentrated to the south and east of Wishaw, centred on the original South Wishaw Community Growth Area and that engagement and consultation was carried out satisfactorily. A summary of the engagement process is contained within the South Wishaw Mini-Charrette Background Report (AD26).

Barratt Homes (West) Scotland (231.305) - The Council considers that the matters raised are addressed under Issue 04 PROM LOC 3 Housing Development Sites and Issue 17 PP 4 Green Belt. The Council maintains that sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that this does not represent a sustainable location justification for any further release.

Sandra McCumisky (236) - The Council recently published its Economic Regeneration Delivery Plan 2019-2023 (AD55), which sets out a high-level framework for improving economic opportunities across North Lanarkshire through investment in four key areas, including its town centres. The Council acknowledges that town centres, including Wishaw, are vital for local economies and sense of community and place. The Council is committed to identifying projects to reshape and re-populate each town centre.

Woodblane Developments Limited (240) - The Council considers that the matters raised in this are addressed under Issue 03 PROM LOC 2 Business Development Sites.

Central Scotland Green Network Trust (254) - The now private houses at Byron Road were built in the 1970s for staff at the then newly built HMP Shotts Prison, explaining their

detached location relative to Shotts. To extend the settlement boundary as proposed would represent an illogical expansion to the General Urban Area, which is currently considered to lie over 600m away to the east, probably requiring the incorporation of the clearly countryside character of Hillhouseridge Farm into the settlement as well. The Council does not agree that the settlement boundary should be extended as proposed.

With regard to new housing, the Council considers that the matters raised are addressed within Issue 04 PROM LOC 3 Housing Development Sites. The Council maintains that sufficient sites have been allocated through the Effective Housing Land Supply and proposed additions and that this does not represent a sustainable location justification for any further release.

Reporter's conclusions:

Site at Branchal Road, Cambusnethan

1. Representation 225-283 is addressed in issue 17: Green Belt Purpose of Place.

Site at Wishaw High Road, Cleland

2. Representation 231-305 says that a site astride Wishaw High Road, Cleland should be removed from the green belt and allocated for residential development. The site has an area of 12.9 hectares and could accommodate 245 dwellings.

3. With regard to residential development, in issue 4, we conclude that the modified proposed plan identifies housing sites in the Motherwell housing sub-market area sufficient to meet the housing land requirements specified in Clydeplan. Paragraph 117 of Circular 6/2013: Development Planning makes clear that the scope of this examination is to ensure that the plan's approach is both sufficient and appropriate. There is no imperative for us to consider allocating further housing sites in the Motherwell housing market sub-area to ensure the plan is sufficient in regard to its provision of housing land.

4. With regard to the green belt, at present, Cleland and Coltness are separated by a distance of some 600 metres. Between them is part of the valley of the South Calder Water, with areas of woodland. These features create a very clear separation between the two communities. Relatively small parts of each built-up area can be seen from the other, in both cases the impression being of development at the top of the valley side.

5. The proposed development would reduce the separation distance to about 350 metres and would extend the Cleland built-up area down into the South Calder Water valley.

6. The representation contends that potential landscape and visual impact would be addressed by suitable mitigation. A tree belt twenty metres wide would be provided along the western and southern boundaries of the proposed development. I find that this would have little bearing on the facts that the separation distance between Cleland and Coltness would be markedly reduced and that the built-up area of Cleland would extend into a section of river valley that is otherwise largely free of development.

7. The proposed development would mean that, from the adjacent section of Wishaw High Road, there would no longer be views to the north-east and south-west across open fields to trees beyond.

8. I therefore do not agree that there would be a lack of visual impact. I find that the proposal would conflict with the Clydeplan objectives that relate to safeguarding identity through protecting the separation between communities and protecting and enhancing the landscape setting and identity of settlements.

9. From my site inspection, I do not accept that the site is urban in character and degraded and that development would lead to environmental and visual improvement. I find that the site has a pleasantly rural character. It makes a positive contribution to local amenity.

10. Submissions include reference to other matters, in particular the council's site selection methodology. These other matters are separate from whether the site should or should not be within the green belt.

11. I am satisfied that the site's green belt designation is appropriate. In these circumstances, and in the context that there is currently no imperative to identify additional housing land in this area, I conclude that the proposed plan need not be altered.

Wishaw Town Centre

12. Representation 236 seeks a focus on regeneration of Wishaw town centre. In its response, the council refers to its Economic Regeneration Delivery Plan 2019-2023.

13. I note that page 12 of the Economic Regeneration Delivery Plan includes: "Since 2008, the Council and its partners have spent more than £30m in town centre improvements. This includes new public sector 'hubs' in Coatbridge and Wishaw ….."

14. From this, I note that Wishaw town centre has received attention. I also note that Wishaw town centre is one of eight established town centres within North Lanarkshire, all of which no doubt would benefit from as much ongoing regeneration as can be procured.

15. In the proposed plan, Wishaw is identified as a strategic town centre. Policy 1A Strategic Town Centres says that the council will support and encourage the provision of a range of improvements to help maintain the role and function of strategic town centres.

16. The representation does not suggest any specific change to the proposed plan.

17. In the circumstances, I find no need to alter the plan in response to the representation.

Eastfield Strip, Edinburgh Road, Harthill

18. Representation 240 is addressed in issue 8 Natural Environment and Green Network Assets.

Hillhouseridge, Shotts

19. Representation 254 is also recorded in issues 4 and 16.

20. So far as I am aware, the various proposals included in this representation are not included in the Main Issues Report, have not been the subject of public consultation and

have not been subject to strategic environmental assessment. Paragraph 118 of Circular 6/2013: Development Planning says:

> "Reporters require adequate environmental information to be provided to them, together with evidence arising from public engagement, without this they will be unable to recommend modifications to the plan on particular sites."

21. In the circumstances, it would not be appropriate to recommend altering the proposed plan in response to the representation.

Reporter's recommendations:

No modifications required.

Issue 033	**Land West of Morningside**	
Development plan reference:	Wishaw Local Partnership Area Proposed Housing Development Site 20/19 Page131	**Reporter:** Christopher Warren
Body or person(s) submitting a representation raising the issue (including reference number):		
Margaret Lang (001) Samantha Lang (002) Marina Dolan (003) Josephine Steel (004) Martin Pickering (005) Catrina Pickering (006) Alison (007) Lesley McCormick (008) Paul McCormick (009) Scott McGill (010) Rebecca Weir (011) Michelle McGill (012) Scott Mitchell (013) Diane Mitchell (014) Ian Thomson (015) Caroline Thomson (016) Lynsey Houston (017) Neil Houston (018) Richard Forrest (019) Stephen Miller (020) Emma Louise Miller (021) Mark Brownlie (022) Nicola Brownlie (023) Ryan Fulton (024) Lydia Ellis (025) Nick Johnstone (026) Jillian Johnstone (027) Catherine McKay (028) Tony Paterson (029) Marion Paterson (030) Amy Hunter (031) Mark Fleming (032) Anne Barr (033) Melissa Lees (034) Graeme Lees (035) Christopher Stone (036) Tracey Stone (037) Cheryl Mooney (038) Siobhan Mooney (039) Colin Nicol (040) Terry Bissessar (041) Hazel Bissessar (042) Mary O'Brien (043)	Anne McGowan (053) Allyson Lachlan (054) Rachel Pettigrew (055) Shannon Frane (056) Stephen Jackson (057) Vicky McLean (058) Tony Cannavan (059) Sean Kelly (060) Mark Paterson (061) Mark Griffin (062) Lynsey McDaid (063) Lynsey Jackson (064) Lynette Cleland (065) Louise Charlton (066) Karen Griffin (067) Joanne Keenan (068) John Lee Thomas (069) John Keenan (070) Jonathan Geddes (071) Ian Moon (072) Graeme Pettigrew (073) Flora Kelly (074) Fiona Geddes (075) Donna Moon (076) David McDaid (077) Brian Macys (078) Ann Macys (079) Graham Hall (080) Clare Hall (081) Laura Weston (082) James Weston (083) Caroline Mooney (084) Jim Mooney (085) Margaret Mooney (086) Mary Ann Frame (087) Shannon Frame (088) Tracey McCulloch (089) Drew McCulloch (090) Heather Richardson (091) Lynda Chang (092) Barry McMillan (093) Susanne McMillan (094) John McLaughlin (095)	Kathleen Brunton (103) Louise Sutherland (104) Craig Hunter (105) Zac Hunter (106) Gillian Hunter (107) Audrey Duffy (108) James Duffy (109) Sarah Duffy (110) Lyndsey Harrold (111) Stephen Harrold (112) Alistair Grant (113) Marion Cuthbertson (114) Jack Murdoch (115) Pauline Graham (116) Allan Wilson (117) Cllr Clare Quigley (118) John Harper (119) Robert McKendrick (120) Newmains and District Community Council (121) Anne Harper (122) Martyn Forrest (123) Martyn Forrest (124) Lynne MacDonald (125) Alan Cameron (126) Lyanne Cameron (127) Margaret McCaul (128) Maryann Milne (129) John McAllister (130) Mairi McAllister (131) Scott McIlvaney (132) Corrina Summers (133) Ian Summers (134) Logan Summers (135) Eileen McIlvaney (136) Kirsty Forrest (137) Patricia Clark (138) Rachel Smith (139) Stephen Dickson (140) Daniel Smith (141) Morven Thomson (142) William McCaul (143) Lisa Neilson (144)	

John O'Brien (044) Angela Nicol (045) Marilyn MacFarlane (046) David Gray (047) David Lang (048) Craig McGowan (049) Ailie McGowan (050) Linsey Bryson (051) Allan Leach (052)	Francis McLaughlin (096) Bridget Mathieson McLaughlin (097) Billy Paterson (098) Joanna Docherty (099) Mark Thomson (100) Emma Thomson (101) Julieann Kerrigan (102)	Gary Neilson (145) Oliver Lang (146) Joseph Currie (147) Marianne Currie (148) Scott Podmore (149) Lynn Podmore (150) Sharon Campbell (151) Fiona Murdoch (152)

Provision of the Development Plan to which the issue relates:	PROM LOC3 POLICY Housing Development Sites – PROM LOC3 Guidance PROM LOC4 POLICY Special Landscape Areas & Green Network Improvements PROM LOC4 Guidance Green Belt PP4 Purpose of Place Policy Green Belt PP4 Guidance All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

Planning authority's summary of the representation(s):

PROM LOC3

Newmains and District Community Council (121), Councillor Clare Quigley (118) and 150 individual objectors object to Proposed Housing Development Site 20/19 (Mapbook 12.6), on the grounds of lack of sewerage infrastructure and capacity in the local road network, Morningside Primary School and NHS services to accommodate development of this site.

PROM LOC4 and PP4

Newmains and District Community Council (121), Councillor Clare Quigley (118) and 150 individual objectors object to Proposed Housing Development Site 20/19 (Mapbook 12.6), on the grounds that the site plays an important role in the wellbeing of residents of Morningside in terms of recreational opportunities, as well as providing wildlife habitats and allowing for the natural regeneration of former industrial land. A Reporter at a previous Planning Appeal noted the lack of sustainable transport access.

Modifications sought by those submitting representations:

PROM LOC3

Newmains and District Community Council (121), Councillor Clare Quigley (118) and 150 individual objectors seek the removal of Proposed Housing Development Site 20/19 (Mapbook 12.6) and that it remains as Green Belt.

PROM LOC4 and PP4

Newmains and District Community Council (121), Councillor Clare Quigley (118) and 150 individual objectors seek the removal of Proposed Housing Development Site 20/19 (Mapbook 12.6) and that it remains as Green Belt.

Summary of response by planning authority:

PROM LOC3

Newmains and District Community Council (121), Councillor Clare Quigley (118) and 150 individual objectors - The Council identified this site through the South Wishaw Mini-Charrette (AD26) which informed the delivery of the South Wishaw Community Growth Area identified in Clydeplan Strategic Development Plan (AD59). The infrastructure to support the dispersed pattern of sites that make up the South Wishaw Community Growth Area capacities can be addressed through the Action Programme (AD18) and any subsequent Development Management Programme. The Council considers that this site is appropriate for the development of housing. Planning Appeal PPA-320-2135 against the Council's refusal of planning permission in Principle for Application 18/00580/PPP Morningside Road, Morningside, Newmains, North Lanarkshire, was upheld, subject to conditions and conclusion of a Section 75 Agreement. Consequently, Proposed Housing Development Site 20/19 now benefits from a conditioned planning permission and it is for the Development Management process to ascertain whether many of the concerns raised can be alleviated, mitigated, or avoided.

PROM LOC4 and PP4

Newmains and District Community Council (121), Councillor Clare Quigley (118) and 150 individual objectors - This site was restored by the same opencast coal extraction that saw the development of private housing in Morningside within the last 15 years and was identified through the South Wishaw Mini-Charrette (AD26), in order to deliver South Wishaw Community Growth Area. This accords with Clydeplan SDP (AD59). Objector's (and Reporter's) concerns relating to access, wildlife and recreational opportunities, can be addressed through the Action Programme (AD18) and any subsequent Development Management process. The Council considers it appropriate to be removed from the Green Belt.

Reporter's conclusions:

1. A substantial number of representations have been made against the proposed allocation of this site. The concerns and objections principally relate to matters including the inadequacy of services and infrastructure; the implications of increased traffic, including congestion and obstruction of traffic on School Road in the vicinity of the primary school; past sewerage problems at some existing properties; the importance of the site as a recreation, wildlife and education asset; environmental benefits of greenspace; and reference to the findings of a previous Scottish Government reporter that the site is not considered to be sustainable.

2. It is of significance that since representations on this site were submitted, an appeal (under DPEA reference PPA-320-2135) has been made against the council's decision to refuse an application for planning permission in principle for residential development on the site. On 4 February 2020 the reporter appointed to determine the appeal issued a notice of intention to grant planning permission, subject to the signing and registering of a legal agreement (or another suitable arrangement), to address matters relating to primary education provision and the revocation of previous planning permissions affecting the site. I understand from the council that the legal agreement was agreed on 16 March 2021.

3. The notice of intention (provided to me by the council) gives careful consideration to all of the above matters, and reaches a conclusion that housing on the site would represent sustainable development. I attach weight to that finding, and the fact that the notice of intention has confirmed the suitability of the site for residential development in principle. This is despite the fact that the final outcome of the appeal is awaited. 4. Based on the evidence before me, and from my own observations during my site inspection, I find no basis to reach a contrary view and I consider the proposed allocation of the site for housing to be appropriate. No modification is required.
Reporter's recommendations:
No modifications required.

Issue 034	**Land at High Street, Newarthill**	
Development plan reference:	Area Strategies Motherwell Local Partnership Area Proposed Housing Development Site 06/17 Page 121	**Reporter:** Christopher Warren
Body or person(s) submitting a representation raising the issue (including reference number):		
Paul Divers (153) Alistair McDonald (154) Ann MacDonald (155) Cheryl Scott (156) Alex Coles (157) Laura McReady (158) Ian Hamilton (159) Paul McAtamney (160) James Dickie (161) Geraldine Ward (162) Lawrence Ward (163) George Burns (164) Michael Burns (165) Moira Burns (166) Graeme & Susan Brough (167) Lisa Bradley (168) Jamie Bradley (169) Taylor Grange Developments (170) Cathy Holmes (171) Iain MacDonald (172)		
Provision of the Development Plan to which the issue relates:	PROM LOC 3 POLICY Housing Development Sites Green Belt PP 4 Purpose of Place Policy Motherwell Local Area Partnership All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.	
Planning authority's summary of the representation(s):		
Paul Divers (153); Alistair McDonald (154); Ann MacDonald (155); Cheryl Scott (156); Alex Coles (157); Laura McReady (158); Ian Hamilton (159); Paul McAtamney (160); James Dickie (161); Geraldine Ward (162); Lawrence Ward (163); George Burns (164); Michael Burns (165); Moira Burns (166); Graeme & Susan Brough (167); Lisa Bradley (168); Jamie Bradley (169); Cathy Holmes (171) and Iain MacDonald (172) object to Proposed Housing Development Site 06/17 at High Street, Newarthill (Mapbook 10.5), on the grounds of its potential impact on drainage, flood risk, wildlife, privacy & amenity (consequent impact on psychological and physical health), water & waste infrastructure, traffic congestion, road safety, construction phase noise and dust, and the burden on local services and facilities. There is no justification to review the urban boundary and for further erosion of the Green Belt at this location. Brownfield land should be prioritised before releasing Green Belt. The above named also question the Urban Boundary Review process (AD27), alleging		

that some, but not all, of the community were informed of the proposed changes and note that he boundary of the allocated site appears to encroach on the rear gardens of 7 existing properties.

Cheryl Scott (156) raises several questions on non-Local Development Plan matters, including:

- names and contact details of the Planning Committee, and if she can receive a free copy of the Modified Proposed Plan 2017
-when the Newarthill town sign was moved, including reason, and
-when and how land classed as Green Belt changes to developable land and what is the notification process for the local community
General comments include the Council's current method of communicating with the public is outdated, social media and/ or email is preferable, and future correspondence should contain the residents name and not Owner/ Occupier.

Taylor Grange Developments (170.215) and supporting documents RD001 - RD007, objects to Policy PP4 Green Belt and the partial allocation only of land at High Street, Newarthill, as Proposed Housing Development Site 06/17, rather than the whole of CfS/MIR Site 0006/17 (SM058) as submitted.

Modifications sought by those submitting representations:

PROM LOC 3 and PP4 Green Belt

Alistair McDonald (154); Ann MacDonald (155); Alex Coles (157); Laura McReady (158); Ian Hamilton (159); Paul McAtamney (160); James Dickie (161); Lisa Bradley (168); Jamie Bradley (169); Cathy Holmes (171) and Iain MacDonald (172) seek the reinstatement of the previous Green Belt.

Cheryl Scott (156) did not offer any sought modification.

Taylor Grange Developments (170.215) seeks the expansion of Proposed Housing Development Site 06/17 (Mapbook 10.5).

PROM LOC 3 and Motherwell Local Area Partnership

Geraldine Ward (162); Lawrence Ward (163) and Graeme & Susan Brough (167) seek the removal of Proposed Housing Development Site 06/17 (Mapbook 10.5) and the reinstatement of its previous Green Belt status.

PROM LOC 3

George Burns (164); Michael Burns (165) and Moira Burns (166) did not offer any sought modification.

Motherwell Local Area Partnership

Paul Divers (153) seeks the deletion of Proposed Housing Site 06/17 (Mapbook 10.5) from the Plan and its reinstatement as Green Belt or a green space.

Summary of response by planning authority:

Paul Divers (153); Alistair McDonald (154); Ann McDonald (155); Cheryl Scott (156); Alex Coles (157); Laura McReady (158); Ian Hamilton (159); Paul McAtamney (160); James Dickie (161); Geraldine Ward (162); Lawrence Ward (163); George Burns (164); Michael Burns (165); Moira Burns (166); Graeme & Susan Brough (167); Lisa Bradley (168); Jamie Bradley (169); Cathy Holmes (171); Iain McDonald (172) - The Council's Urban Boundaries Review Background Report (AD27) sets out the genesis, concept and implementation of the Council's rationalisation of its settlement boundaries to reflect Scottish Planning Policy terminology. Proposed Housing development Site 06/17 (Mapbook 10.5) was allocated on the grounds that it provided a limited opportunity to support the sustainability of Newarthill in terms of service provision. Key agencies were consulted as part of the consideration of planning application 19/00416/FUL and no objections were raised to development at this site. The new settlement boundary was drawn up to the strong tree line from east to west, the nearest defensible boundary, and to mirror the extent of housing on either side of the permitted site. Any planning-based concerns raised relating to loss of privacy/traffic/drainage and the provision of physical and social infrastructure can be included in the Action Programme and potentially alleviated, mitigated or avoided through the Development Management Process.
The Council maintains that this site has been appropriately identified for development in principle and does not agree that it should be removed.

Cheryl Scott (156) - The matters listed are not Development Plan matters and many of the points raised have been responded to under separate cover.

Taylor Grange Developments (170.215) - The Site Selection Methodology Report (AD25) sets out that this site was excluded at Stage 2 due to locational Housing Need and Demand. It was partially included through Stage 1 as result of planning consent and by default automatically included in the Modified Proposed Plan. A Council decision was then made at Planning Sub-Committee (Appendix 2: 2018 Modified Plan Proposed Site Changes) (AD49) for a revision to the urban boundary at this location towards a defensible boundary and to reflect the extension of development north of the B7066 on either side of the proposed housing allocation.

In recognition of the number of objections received to the nearby Modified Proposed Plan Proposed Housing Development Site 06/17 (Mapbook 10.5) from the local community, compounded by the lack of locational housing need and demand at this location, the Council feels that the further release of land for housing in the Green Belt at the location is not required or appropriate at this stage/Plan cycle.

Reporter's conclusions:

1. The council has identified this site as a new housing allocation. Part of the site has planning permission for residential development, and the council's approach is to include all such sites as an allocation. The site identified as allocation 06/17 P applies to a larger area of land than is affected by the current planning permission. Instead, this aligns with the conclusions of the council's Urban Boundaries Review exercise, which was focused on amendments to the boundaries between the identified general urban area and countryside/green belt.

2. Representations have contended that this site forms an important and attractive break in development between MacInnes Drive and Biggar Road, and should therefore be

retained as green belt. During my site inspection, I noted that the principal outlook from properties on Biggar Road is across the land in question, and I appreciate that development of the site would detract from the amenity this outlook provides. However, the loss of a view is not a material planning consideration. The question is therefore whether a break in development between Biggar Road and MacInnes Drive is of wider public amenity value, or of importance to the setting of Newarthill.

3. Travelling along High Street (whether on foot or in a vehicle) the properties on Biggar Road and further east on High Street appear as the edge of the village. Whist this site is perceptible as an undeveloped field, I got no impression of this gap in development making an important contribution to the setting of Newarthill.

4. From Biggar Road (on the north side of High Street) there are views across the site. The site is also clearly visible when approaching Newarthill from the north along Biggar Road due to the local topography. However, I do not consider that the purpose of the wider green belt designation which surrounds Newarthill would be compromised by development of this site. The allocated site would extend no further north than development on MacInnes Drive and Biggar Road, and so it would relate well to the established pattern of development. I can see no overriding need to maintain an undeveloped gap between the properties on Biggar Road and other development to the west.

5. Reference has been made to the recreational value of the site, but any such use must be on an informal basis and this would not justify the site's retention as green belt. I do not find the site's development would compromise the community's access to public open space or wider countryside and recreational routes.

6. There is no reason in principle why development of the site would be overbearing or would lead to unacceptable loss of privacy at existing properties. These are matters which can only be addressed through detailed site layout and design, which would be assessed through the development management process. Matters relating to surface and foul water management are similarly important issues, but there is no evidence of any insurmountable constraints, which would indicate that the suitability of the site for housing should be rejected as a matter of principle. Species and/or habitat surveys could be required to support any forthcoming planning application, if deemed to be necessary by the council. I note the concerns raised regarding noise and dust from construction. This is, to some extent, an inevitable but temporary impact from any development. The level of disturbance can be managed through planning conditions, including limiting the hours of construction.

7. In regard to traffic and access implications, this potentially presents the greatest challenge given that High Street is a busy road, and the staggered crossroads junction with Biggar Road would need to be accounted for. In its favour, the site has an ample frontage onto High Street, where there is good visibility in both directions, so a satisfactory junction arrangement should be achievable.

8. Concerns have been raised about the increased use of Biggar Road between High Street and Edinburgh Road to the north. It has been asserted that this road is used as a shortcut / rat-run route. I witnessed some evidence of this during my site inspection. Given the site's relatively modest size, depending on the number of homes to be built it may not be necessary to provide an access directly onto Biggar Road as well as High Street, and any additional traffic generated by the development and using Biggar Road

would be imperceptible. If two access points were deemed to be necessary, the option may exist to accommodate a through-route in the site which could potentially improve the current situation on Biggar Road, possibly even enabling the stopping-up of the northern Biggar Road/High Street junction, if this was considered beneficial and necessary to safely accommodate two access points for development on the allocated site. Ultimately, there appears to be options for how access may be satisfactorily accommodated.

9. It has been questioned in a representation whether the allocation includes some domestic gardens. This does not appear to be the case, but even if there was a slight anomaly on the plan, it would be inconsequential as it would not give a developer any power to acquire land outside of their control, to form part of the site's development.

10. The proposed plan contains policy provisions to require developer contributions to ensure that additional pressures generated by the occupiers of new development can be addressed. As the council has put this site forward for allocation, this in itself indicates that there are not considered to be any overriding constraints of this type in this location.

11. I have also had regard to the site appraisal undertaken by Fairhurst on behalf of the site's promoter. This provides further confirmation that there are no irresolvable technical constraints to development of the site.

12. The site's promoter has objected to the proposed plan on the basis that a larger area of land has not been allocated, on the north side of the proposed allocation. In issue 04 we have concluded that the proposed plan identifies a sufficiently generous supply of housing land, with the exception of in the Airdrie and Coatbridge housing sub-market area. With this in mind, there would be no value in us reaching detailed conclusions on the potential suitability of sites outwith the Airdrie and Coatbridge housing sub-market area, because in any event their inclusion would not be addressing an insufficient or inappropriate aspect of the proposed plan. To allocate additional land for housing in this location would go beyond the scope of the examination.

13. All told, I find the allocation of site 01/07 P for housing is appropriate and a logical infill site, and no modification is required. Extending the allocation to include additional land to the north would not be justified given the proposed plan already identifies sufficient housing land in the Motherwell housing sub-market area. No modification is required to the allocation boundaries.

Reporter's recommendations:

No modifications required.

Issue 035	**Land at Coatbridge and Langmuir Road, Bargeddie**	
Development plan reference:	Coatbridge Local Partnership Area Proposed Housing Development Site 02/09 Page111	**Reporter:** Christopher Warren

Body or person(s) submitting a representation raising the issue (including reference number):

Lisa Dolson (193)
Bryce Baxter (194)
Elizabeth Baxter (195)
Sam Orr (196)
Hugh Weir (197)
Ben Dolson (198)
Helen Barr (199)
Neil John Diamond (200)

Provision of the Development Plan to which the issue relates:	PROM LOC3 Policy and Guidance PP4 Policy and Guidance All proposed development will be subject to assessment against relevant legislation and all other Policies in the Plan.

Planning authority's summary of the representation(s):

Lisa Dolson (193), Bryce Baxter (194), Elizabeth Baxter (195), Sam Orr (196), Hugh Weir (197), Ben Dolson (198), Helen Barr (199) and Neil John Diamond (200.257) object to the allocation of Proposed Housing Development Site 02/09 Langmuir Road/ Coatbridge Road, Bargeddie (Mapbook 9.3) on the grounds of loss of Green Belt, adverse visual impact on the character and setting of the area, impact on infrastructure and local services and wild life. In addition Helen Barr (199) objects on the grounds of impact on family business.

Modifications sought by those submitting representations:

Lisa Dolson (193), Bryce Baxter (194), Elizabeth Baxter (195), Hugh Weir (197), Ben Dolson (198) and Neil John Diamond (200.257) seek the removal of Proposed Housing Development Site 02/09 (Mapbook 9.3) and that it remains as Green Belt.

Sam Orr (196) and Helen Barr (199) offered no sought modification.

Summary of response by planning authority:

Lisa Dolson (193), Bryce Baxter (194), Elizabeth Baxter (195), Sam Orr (196), Hugh Weir (197), Ben Dolson (198), Helen Barr (199) and Neil Diamond (200.257) - The Main Issues Report 2015 (AD21) identified a shortfall in the supply of land for housing in the Airdrie/Coatbridge Housing Sub-Market Area, in which Bargeddie is located, which contributed to the Reporter's decision to allow an Appeal to remove the Green Belt east of Oakridge Road. Proposed Housing Development Sites 01/09, 02/09 (Mapbook 9.3), 05/09 and 06/09 were duly assessed as appropriate to be allocated as part of strategy to tackle this shortfall through the Site Selection Methodology Report (AD25). Proposed Housing Development Site 02/09 (Mapbook 9.3) was put forward by agents acting on

behalf of the land owner in 2013 Call for Sites and is bounded on 3 sides by existing urban development. It lies below the ribbon of 1930s houses that line the northern side of Coatbridge Road, and which predate the introduction of planning legislation, with close proximity to the strategic road and rail network and local facilities. Concerns relating to sewerage/drainage/traffic/access/landscaping/layout/air quality and the provision of consequential physical and social infrastructure (e.g., a new school instead of housing on Site 06/09) can be addressed through the Action Programme (AD18) and the determination of any subsequent planning applications. It is shown in AD72 that A Tinto/Deuchny Properties Limited (258) supports the allocation of Proposed Housing Development Sites 01-09 and 02-09.

Reporter's conclusions:

1. Objections have been made to the proposed allocation of this site. Representations have referred to the loss of green belt and agricultural land; adverse visual impact; impacts upon the already congested local road network including road safety implications and constraints to access; drainage problems; air pollution; and the scale of housing development already taking place in the area.

2. The site is within the Airdrie and Coatbridge housing sub-market area, where we have identified a housing land shortfall. In its preparation of this plan, the council had also identified the need for further housing sites in this sub-market area. This site has been proposed for allocation by the council to contribute to addressing the shortfall.

3. In the council's site selection methodology background report, appendix 4 included the completed 'site sustainability and deliverability matrix' for this site.

4. Currently development is principally confined to the west side of Langmuir Road and to the north of Coatbridge Road, but there is also a more sporadic mix of residential and industrial development to the south of the site. Whilst the development of the site would therefore represent a notable extension to Bargeddie, I find the site relates well to the established pattern of development which contain the site on three sides. I also note that other allocations are made further to the east, also on the south side of Coatbridge Road, and so I am satisfied that the proposed allocation would be a logical urban extension.

5. The site does currently make a positive contribution to the landscape setting of Bargeddie, and there are open public views across the site to the south. The site has previously been designated as green belt, but it is proposed that this boundary be redrawn so that the land between Coatbridge Road, Langmuir Road and the railway would be within the 'general urban area'. A modest green gap between Bargeddie and Coatbridge would be safeguarded along the line of Luggie Burn, but I acknowledge that the site's development would to some extent diminish the amenity provided by the open, agricultural character of the site and vistas across it.

6. Whilst the allocation does not apply to the full extent of agricultural land, the remaining unallocated agricultural land between this site and allocations 06/09 and NLMK1187 to the east would be within the general urban area and not subject to any specific safeguards. Overall however, I do not find that the development of the proposed site would detract from local character and amenity, or lead to landscape and visual impacts, to the extent that its allocation would be inappropriate. Careful site layout, design and positioning of any open space are matters that could ensure the site's development would make a positive contribution overall.

7. Regarding access, direct vehicular access to Coatbridge Road is constrained because it is a dual carriageway. There would however be sufficient options for siting one or two junctions on Langmuir Road, to ensure adequate, safe vehicular access. The site is within easy walking distance of well served bus routes and Bargeddie rail station. There are already signal-controlled pedestrian crossings on Coatbridge Road and Langmuir Road in the vicinity of the site, although there may be a need for further off-site enhancements to pedestrian facilities, to encourage active travel and to facilitate public transport use. Traffic levels in the vicinity of the site are high, particularly at peak periods, but there is no evidence before me to indicate that the additional traffic generated by development of this site would be incapable of being accommodated.

8. In regard to air pollution, the site's proximity to public transport would reduce reliance on private cars by future occupiers. Being positioned next to busy main roads, this may have some impact on air quality within the development. However, no evidence has been presented to indicate that air quality is a particular problem in this locality and the location of the allocation must be considered in the context that, generally, sites in or adjacent to urban areas are preferable to a more dispersed development pattern.

9. The council's matrix has not identified any particular drainage constraints, and I am satisfied that the small areas of the site at risk of surface water flooding could be avoided, or addressed through applying sustainable urban drainage system principles. The site is not subject to any habitat designations and there is no evidence of the site being of particular nature conservation value.

10. Whilst I recognise that there are a number of recent developments and other allocations in this area, I am satisfied that this site would represent a suitable addition, and the scale of development that could be accommodated would be appropriate to its context. The council has referred to detailed matters being addressed through the development management process. A great deal of reliance is being placed on wider policy requirements and professional judgement at the planning application stage, as no site-specific requirements or constraints are outlined in the plan. Despite this, I am satisfied that the proposed allocation of the site is appropriate in principle, and no modification to the plan is required.

Reporter's recommendations:

No modifications required.