

*South Lanarkshire Proposed Local
Development Plan
Representation by Jackton & Thorntonhall
Community Council – September 2018*

Refers to Section 5.6 of Proposed Plan – Volume 1

Abbreviations used in this representation

LDP2 or Proposed Plan	South Lanarkshire Local Development Plan 2 – July 2018
HMA	Housing Market Area
Clydeplan 2	Glasgow & The Clyde Valley Strategic Development Plan 2
SLC	South Lanarkshire Council
JTCC or the Community Council	Jackton & Thorntonhall Community Council
MIR	Main Issues Report

East Kilbride Community Growth Area

History

In 2006 the Glasgow & Clyde Valley Structure Plan Alteration forecast that the number of private sector households in the City Region would grow to 681,000 by 2018. This meant that there wasn't enough housing land to meet demand. To fill the gap the Plan called for the creation of 13 Community Growth Areas (CGAs) with capacity for over 22,000 units. One of the CGAs, with a capacity for 2,500 units, was to be at East Kilbride.

The subsequent South Lanarkshire (SLC) Local Plan duly designated land at Jackton to create the East Kilbride CGA. By the time this had happened, more housing land had been found elsewhere so the Local Plan said that the EK CGA needed to produce only 1,500 units by 2018. The Plan said that part of the CGA land (equivalent to 1,000 units) would be returned to green belt status if not required after 2018.

Here is an extract of the finalised SLC local Plan

Community Growth Areas

Policy STRAT 2

Proposed Community Growth Areas Policy

To satisfy strategic housing land requirements as identified by the Glasgow and the Clyde Valley Structure Plan, the areas identified in Table 2.2 'Community Growth Areas' and on the Proposals Map, will be released from the Green Belt dependant on satisfactory master plans being submitted to and approved by the Council. Land allocations at Larkhall and East Kilbride include land to satisfy potential longer term requirements that require to be proven through future housing land assessments.

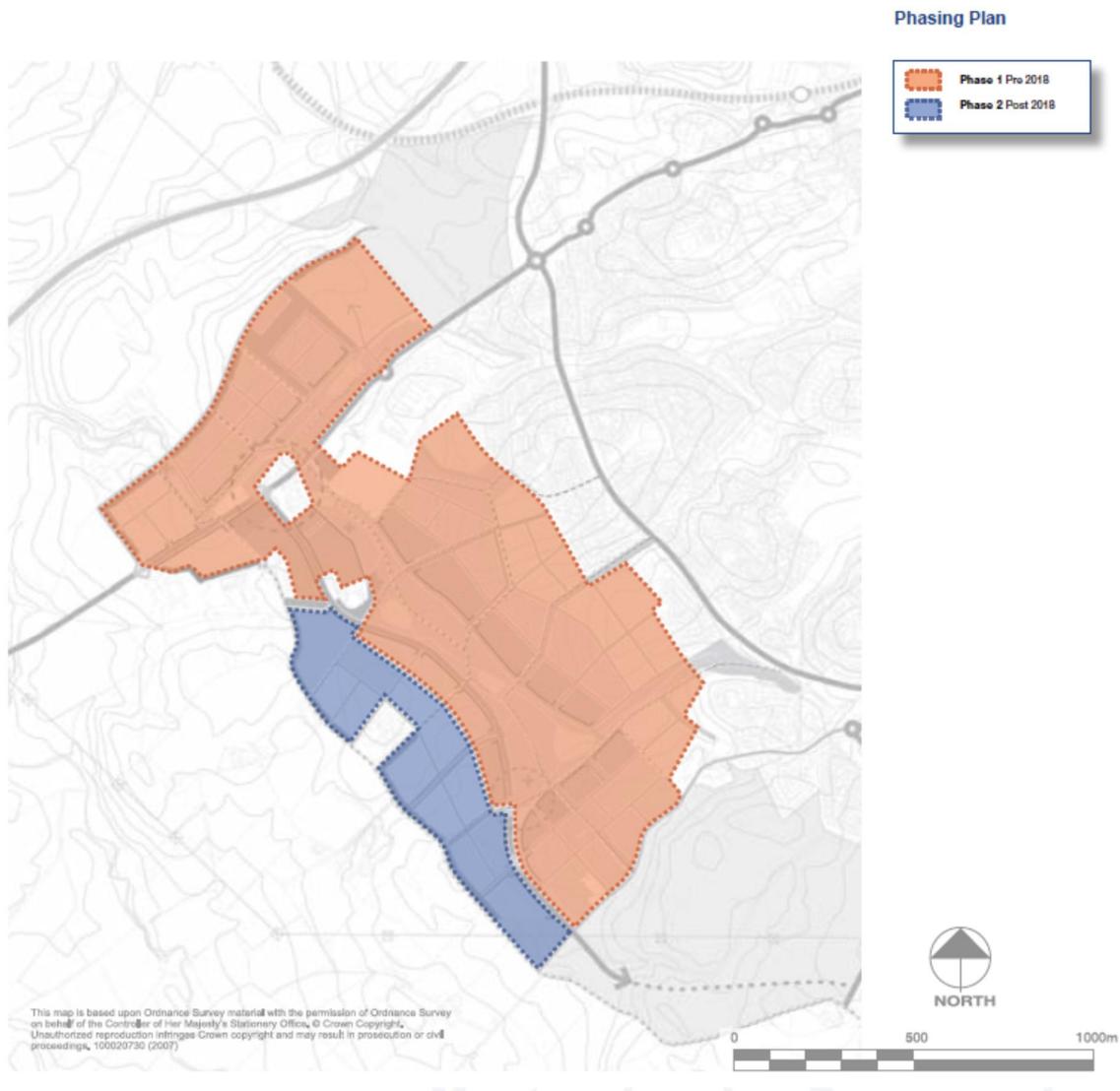
2.4 The Glasgow and the Clyde Valley Structure Plan, as altered in 2006, has identified additional development capacity for housing from existing urban expansion areas and from a search for new areas. This is due to a potential housing shortfall across the conurbation of 19,000 units in the period between 2011 and 2018. In South

Lanarkshire six areas have been identified to contribute to meeting these future requirements and are identified in Table 2.2 'Community Growth Areas' and the Proposals Map. In addition, two of the areas, Larkhall and East Kilbride, have potential to meet longer term land requirements, beyond 2018. In accordance with Structure Plan policy, the confirmation of these longer term requirements will be undertaken through future housing land assessments. However, to reflect the Structure Plan the necessary land allocations are included in the Local Plan. Should it be demonstrated that these long term requirements are not proven, land will be returned to the Green Belt as appropriate.

Table 2.2 Community Growth Areas

Community Growth Area	Capacity to 2018	Capacity Post 2018	Total Capacity
Ferniegair/Larkhall	1,000	1,000	2,000
Newton	1,500	-	1,500
East Kilbride	1,500	1,000	2,500
Hamilton West	2,000	-	2,000
Carluke	500	-	500
Total	6,500	2,000	8,500

In August 2007, SLC issued a "Masterplan Development Framework" (MDF) document for the East Kilbride CGA and this was presented as a "core document" at the Public Local Inquiry into the (2009) Plan. The MDF clearly described the separation of development of the site into two phases (pre and post 2018) with the area potentially to be returned to green belt status shown on the phasing map (reproduced below) on page 24.



Current Situation

Since that Local Plan was adopted in 2009, there have been a number of significant developments.

1. Clydeplan 2 has revised downwards sharply the projections for private sector household growth. Instead of private sector households reaching 681,000 by 2018, the new forecast is for household numbers to only reach 635,000 by 2029. This pattern of reduction is true across almost the whole of the Clydeplan area and is applicable to East Kilbride HMA and to South Lanarkshire as a whole.
2. Across the City Region, housing land supply has also grown with over 15,000 units added between 2012 and 2015 alone. There has also been a substantial increase in housing land in the East Kilbride area over the same period – partly from windfall sites being added and partly from sites added through LDP1.

The result is that there are now significant surpluses of housing land in all housing market areas including East Kilbride. This is illustrated clearly in the Housing Technical Report “Future Programming” section on page 10.

If current household projections had been used in 2006 there would have been no need to introduce the CGAs

Since 2018 is upon us and will probably have passed by the time the examination of the Proposed Plan takes place, it is now appropriate that South Lanarkshire Council honours the commitments it gave in the 2009 Local Plan (which was the subject of a Public Local Inquiry and was subsequently approved by Scottish Ministers) to return surplus elements of the East Kilbride Community Growth Area to their previous green belt status since it is abundantly clear that the “longer term requirements” mentioned in the 2009 Local Plan are not proven.

Applications covering (inter alia) that part of the EK CGA shown as phase 2 on the MDF have been submitted on two occasions and have twice been offered conditional approval (most recently in May 2018). At the time of writing, however, the applicants have not agreed to the conditions¹.

JTCC has had a considerable correspondence with employees of SLC who have, on both occasions that applications for parts of the CGA including phase 2 have been put before the Planning Committee stated in Committee Reports that the applications were in accordance with the (then) plan and recommended conditional approval. We have established that:

1. No need for the phase 2 CGA land has ever been established,
2. No change to the commitment to return surplus CGA land to green belt status has been announced through the subsequent Local Development Plan and,
3. The Council has never rescinded its commitment to return surplus CGA land to green belt status by any other means.

We have further established that removal of 1,000 units from the East Kilbride CGA would have no adverse impact on the effective land supply (since this contains only a few hundred units attributable to the CGA) and only a very limited impact on the non-effective one.

Benefits of Removing Phase 2 Land from EK CGA

1. According to public documents and conversations with SLC employees, SLC intends to spend £26.8m of Glasgow City Deal funding to subsidise development of the EK CGA. By reducing the size of the CGA, the level of subsidy required would be reduced².
2. Reducing the size of the CGA would make it more economically viable and promote more rapid development. This would have the further effect of reducing developer pressure for the release of other smaller surrounding sites.

¹ Should conditions be met by developers and planning permission be granted (contrary to the Council’s stated policies) it is possible that a judicial review of the decision might be sought. In such circumstances it is accepted that the examination of the Proposed Plan would have to defer consideration of this issue pending the outcome of the review process.

² We have described this as expenditure or subsidy rather than “investment” because it cannot be now expected to generate any positive return. The original case used for providing public money to “kick start” this and other CGAs was based on an assumed shortage of housing land that is now known not to exist.

3. Reduced uncertainty would be welcomed by local residents who have endured 10 years of waiting and have faced difficulties in their ability to move due to the adverse effect that uncertainty has had on the local housing market
4. Greater choice of sites would be encouraged by reducing the size of the CGA and stopping it “crowding out” other developments in the East Kilbride Area
5. Removing Phase 2 from the EKCGA would reduce the necessary incursion into what has long been considered one of the most sensitive corridors of green belt lying between East Kilbride and the conservation village of Eaglesham
6. Honouring a long-standing and freely-given commitment would enhance the credibility of SLC and enhance its reputation for fairness
7. Reduce the negative impact that the CGA would have on the setting of the cluster of listed buildings on Jackton Road (Lawside, Newhouse and North Craighall) thus supporting Policy NHE3

Requested Changes

1. Add the following wording to the end of section 5.6 of Volume 1: “This background now requires the Council to honour its pledge to return part of the East Kilbride Community Growth Area to green belt status since no need to retain it in housing land supply has been identified. The land in question is a strip of land largely sitting between Jackton Rd and the Gill burn and identified on the East Kilbride Settlements Map”.
2. Amend the East Kilbride Settlements map to show the part of the CGA that is to be returned to green belt status and the amended settlement boundary. This should correspond precisely to that area identified as “Phase 2” and shaded in blue on the map on page 24 of the East Kilbride CGA Masterplan Development Framework.
3. Amend figures and totals in the Housing Technical report to reflect the above changes.
4. Amend any other parts of the Proposed Plan as required to make them consistent with changes 1-3 above.