

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

Refers to Section 5.8 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

Introduction

Jackton & Thorntonhall Community Council (JTCC) considers that it would be inappropriate to include the proposed housing site at Peel Road Thorntonhall in the housing land supply based on the information that is provided in the Proposed Plan.

JTCC has tried to engage with SLC in order to try to understand the rationale for the inclusion of the Peel Road site in LDP2, what the Council's vision for the site consists of and how it is thought to improve housing choice. We have been told, however, that there is nothing to discuss until such time as a planning application is submitted. It appears from this response that SLC has no clear answers (or none that it is prepared to share publicly) to any of these reasonable questions.

As noted below, JTCC is not opposed in principle to development within the villages but, because SLC's reasons for proposing this site and its vision for how it should be developed are currently so obscure, we have no option but to object to its inclusion in the Proposed Plan. Should SLC now be prepared to provide adequate details and provide appropriate assurances, it might be possible for this objection to be withdrawn.

Background

JTCC notes that it is acknowledged that across South Lanarkshire there is already a more than generous supply of housing land to meet expected private sector demand up to 2023/24 with a margin of 53%. For all tenures, the margin of generosity is still 37.6%. Dealing with the East Kilbride sub HMA on its own, the margin of generosity for private sector demand is slightly below the rest of South Lanarkshire but, at 36%¹, is still far in excess of the 15% margin called for in Clydeplan 2. The proposed addition of 340 units would, if approved, increase the margin of generosity in East Kilbride HMA to 66%.

Whilst it is reasonable that some margin of generosity is built in to allow for forecasting errors, to exceed the required margin of 15% by such a substantial amount brings no benefits. To quote the (then) Chief Planner writing in 2010 *"Where a planning authority has a 5 year supply of effective housing land but the impediment to developing that site is the general availability of mortgages or low level of demand from purchasers then there will be little if anything to be gained by releasing additional sites."* In other words, adding more capacity to an already generous supply of housing land will do nothing to

¹ Derived from Clydeplan 2, Schedule 9 for housing target and Housing Technical Report Table 7 for supply.

boost output because, by definition, the constraint on output is not the availability of suitable land but the relative paucity of demand.

In the Housing Technical Report it is stated on page 11 that *“...a small number [of housing sites] are being proposed for release, in areas where there is particular pressure to ensure further generosity”*. No explanation is offered as to the nature of this pressure, from where it is coming or why South Lanarkshire Council considers that it should succumb to it (see preceding paragraph on the futility of over-generosity). It would appear from the “Call for Sites” report that only part of this Thorntonhall site was proposed for development by owners or controllers and that SLC itself added significant amounts of land. This makes the explanation offered in the Housing Technical Report questionable at best.

A slightly different spin is put on the additional proposed sites in paragraph 5.8 of the proposed plan: *“a few sites were put forward at the Call for Sites stage which offered an opportunity to address specific issues relating to infrastructure, or would allow for some additional flexibility and choice”*. Specifically, in relation to the Peel Road site, *“an opportunity for further housing choice within the village (approximately 160 units)”*. It is unclear how such a site would increase the **choice** of housing within the village. In order to do so, the site would have to exhibit characteristics that might permit development significantly different to the existing stock of housing. Yet it is the case that in assessing this and other sites that were brought forward in the “Call for Sites” exercise prior to the MIR, SLC used exactly the same criteria for this site as for all the others and virtually identical criteria to those used in the Call for Sites stages of LDP1 and the preceding Local Plan. Furthermore, there is no evidence available to suggest that potential purchasers of property in the area are being deterred by any lack of choice of properties in the village.

While it is true that there is little if any affordable housing in Thorntonhall, this is largely because recent developments in the village have not included any – the developers preferring instead to make financial contributions to SLC to permit SLC to provide affordable housing elsewhere. There is no reason to suppose that the possible developers of the proposed Peel Road site will take a different view because to do so would provide them with sub-optimal returns.

Even if it is the case that SLC has good and valid reasons for believing that the Thorntonhall site would indeed provide additional housing choice in the village, it is questionable whether including the site in this proposed plan is the best way of achieving that type of choice. Once land has been added to the land supply, SLC does not have a good record of resisting development that does not accord with their vision (for example, the site at Philipshill that was brought in to the HLS in order to provide a retirement village, but which is now being developed by Barratt as a standard private housing). Once a site is designated for housing, landowners will seek to achieve the best possible price for their land and this is likely to be delivered by a developer building highly priced units similar to other recent developments in the village.

SLC would retain greater control of possible development of this site by leaving it out of the housing land supply at this stage. Should suitable proposals for development of the site subsequently be brought forward, these could be dealt with on their merits and, if providing the desired choice, approved.

Rationale in Relation to Stated Plan Policies

The proposal to include the Peel Road site in the housing land supply is difficult to reconcile with the stated overall strategic vision of the Plan “To promote the continued growth and regeneration of South Lanarkshire by seeking sustainable economic and social development within a low carbon economy whilst protecting and enhancing the environment” since housing development on this site would not be sustainable, would not contribute to a low carbon economy and would not protect and enhance the environment.

Contrary to policy 1 points 1, 5, 6, 9 and 10

Contrary to policy 2 points 1,2,3,6, 7 and 8

Impossible to reconcile with the statement in paragraph 5.6 that “...there is a generous and adequate supply of effective land for housebuilding across South Lanarkshire and that there is no requirement for further sites to be released.”

Difficult to reconcile with policy 15 and Policy SDCC4 as the train service at Thorntonhall is infrequent, at full capacity at peak travel times and not easily upgraded due to the constraints of the single track. There are no cycle paths that could reduce potential road traffic generated by the site and no pavements to permit safe walking to the nearest bus stops.

We note the comments by Scottish Natural Heritage (MIR Consultation Responses No. 352) recommending that any housing sites added to the land supply should fall within the “compact city model” described in SDP2 and agreed by member authorities. This site would not comply with the model.

Rationale in Relation to JTCC Development Policy

JTCC debated and adopted in 2015 a development policy for the two villages. A copy of this policy was lodged with South Lanarkshire Council and is displayed on JTCC’s website. The relevant section is:

We seek to maintain and enhance the existing character of both villages while, at the same time, acknowledging that they must be allowed to develop in order to remain relevant to the requirements of future populations. This means that we will support development that is proportionate, sustainable, sympathetic to existing architectural styles and which is fully integrated into the framework of the present villages.

JTCC considers that the inclusion of the relatively large site at Peel Road, Thorntonhall would represent both a disproportionately large addition to the Thorntonhall housing stock and an unsustainable one because it could not be considered to contribute to sustainable development. We are also concerned that a third contemporary style development would both alter the character of the existing village and, by being self-contained and inward-looking, fail to integrate with the framework of the existing settlement.

Other Considerations

Development of the proposed Peel Road site together with the proposed Redwood Drive site would add 280 households to the western edge of East Kilbride. It is understood that there is already a shortage of primary school places in the area and these developments would exacerbate the situation.

It is understood that SLC is seeking to procure a new primary school within the proposed East Kilbride CGA which might provide additional capacity. At the time of writing, however, it is by no means clear that development of the East Kilbride CGA will go ahead and, if so, how soon the primary school could be built and opened.

Unless SLC has alternative plans to provide additional primary school capacity, JTCC considers that it would be premature to add the proposed sites at Thorntonhall and Redwood Drive to the housing land supply at this time.

Requested Changes

Delete Peel Road, Thorntonhall from the list of potential sites in section 5.8 of Volume 1 and from the "Additions to Housing Land Supply" section of the Housing Technical Report and anywhere else it may appear.

If, notwithstanding the absence of need or reason for inclusion of this site in the Plan, it is considered expedient to sanction it, JTCC considers that such sanction should be contingent upon the following points being fully addressed before any possible development is given planning permission. This could best be achieved by means of a residential masterplan. To quote the Call for Sites (p155) "*The masterplan would need to show that delivery of the site was possible before it would be released from the green belt.*" JTCC would be keen to work with Council employees and their consultants to help to draw up an appropriate Masterplan Development Framework.

An independent qualified traffic consultant has identified that access to this site from Peel Road would be problematic and that an appropriate and lawful solution would require major works to straighten Peel Road, require the acquisition of additional land in order to construct a roundabout of adequate dimensions and would require improvements to be made to the roundabout where Peel Road meets the A727 and the Carmunnock bypass.

Scottish National Heritage sound a note of caution about the Peel Road site "Around Thorntonhall and in adjoining areas of East Renfrewshire the massing, materials and strong urban form of recent development and highlight the potential for further erosion of and change to the strong rural landscape character through further development. In our view, the site at Peel Road East would require further consideration to be given to landscape capacity, siting, design and mitigation measures to ensure the landscape setting and strong rural character of the approach to Thorntonhall along Peel Road from the north east is not eroded." (MIR Consultation responses No 354).