



The Scottish Parliament
Pàrlamaid na h-Alba

Jackson Carlaw MSP
Member for Eastwood

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Development Management
2 Spiersbridge Way
Spiersbridge Business Park
THORNLIEBANK
East Renfrewshire
G46 8NG

Dear Sirs

2017/0367/TP – Site Adjacent To West Of 207-302 Glasgow Road Waterfoot East Renfrewshire

I would appreciate if you would take this letter as an objection to the planning application by Gladman Developments for a major residential development on West Glasgow Road, Waterfoot.

Having reviewed the planning documents in respect of this housing development, I begin by stating that I have many concerns regarding this unsolicited and unexpected development on the ever diminishing greenbelt in Waterfoot.

It is difficult not to have at the forefront of our minds the previous CALA Homes development, which we were assured, was not to be the thin end of the wedge. Understandable as it may be that due to the increasing population in East Renfrewshire, more housing will be required, opposition to this proposal is not to oppose all housing developments. It is essential, however, that each application is reviewed individually and carefully.

Local Development Plan and Main Issues Report

Main Issues Report, November 2016

In Chapter 2 of the Council's Main Issues Report, published in November 2016, the Council sets out two options '2A' and '2B' for housing developments within East Renfrewshire. Whilst option 2B envisages no changes to East Renfrewshire's green belt boundaries as set out in the previous Local Development Plan, Option 2A does recommend that construction projects should be allowed to take place on certain greenfield sites within the local authority area.

However, on page 36 it is made abundantly clear that house building projects should not take place on greenfield sites where public transport links are relatively scarce:

"Option 2A also aims to deliver a broader distribution and flexible supply of land for housing around all communities through the promotion of a number of new small-medium scale sites,

some of which would be released from the Green Belt. **These sites are located in sustainable locations close to services and facilities and a variety of modes of transport including bus and/or train** or provide potential opportunities for improvements in these areas and will support the Plan's wider agenda of creating healthy active communities".

In respect of trains, the nearest stations to the site earmarked for development by Gladman are Clarkston, Busby and Thorntonhall. These three stations are located approximately 2.5 to 3 miles away from the land West of Glasgow Road and would likely take most residents between 40-60 minutes to reach by walking and thus, it is suggested, are not practical options for those who do not have access to or who do not wish to travel by car. In terms of bus facilities, I do note that there are a number of stops in the Waterfoot area such as at Barlae Avenue and Craighlaw Drive. However, given the increasing popularity of trains as a mode of transportation and the consequent impact this has had on bus usage, allied with the less than optimal bus service that is available in Waterfoot, I am strongly of the view that this planning application fails on the criteria of good transport links as per LDP in the immediate area meaning consent for Gladman to build in this part of Waterfoot should be withheld for a second time.

Local Development Plan ("LDP") 2015

The most recent local development plan issued in June 2015 states '**The council's broad strategy is based upon an Urban Expansion growth approach**, comprising two key strands: (1) Consolidation; (2) Controlled Urban Expansion' (ERC LDP, 2015: 14). In a similar passage the paper specifically denotes the centrality of brownfield sites to future development in East Renfrewshire and the need to protect green spaces,

"The Council supports a complementary two strand approach to development as follows: Regeneration and consolidation of urban areas with an **emphasis on developing Brownfield and vacant sites** alongside **the continued protection and enhancement of the green belt** and countryside around towns and the green network" (ERC LDP, 2015: 20).

Building on the land west of Glasgow Road is fundamentally opposed to these stated objectives. Indeed, allowing Gladman to commence with their construction project would not contribute to 'the continued protection and enhancement of the green belt' but would, in actual fact, severely erode it and potentially set the stage for more development in Waterfoot with potentially damaging effects for its green field sites. This is linked in with 'the fear of harm' and 'creation of a precedent' material considerations which are detailed below.

Consequently, I am in agreement with the LDP that the emphasis of development in East Renfrewshire should be on exploring development opportunities in urban areas and on safeguarding the greenbelt sites in the local area.

Providing Gladman with consent to build on the proposed site in Waterfoot would be very much against the strategy set out by the council in the 2015 Local Development plan

Much is made in the LDP of ensuring that East Renfrewshire as a whole retains its appeal of being a "desirable place to live and work" however consistent overdevelopment in Waterfoot will have the opposite effect. Green spaces which include the green belt are important for a community to use and should not be burdened with buildings as we have seen occur with

Waterfoot Park, yet this development represents a further incursion into the ever decreasing greenbelt in Waterfoot.

National Planning Framework

As you will be aware with the plan led system much weight should be given to the LDP and the National Planning Framework (NPF). As stated above, taking the ERC LDP in the round (as required in *City of Edinburgh v Secretary of State for Scotland*) it gives much consideration to the green spaces available within in East Renfrewshire and the attraction of these in people choosing to move to the area. It is submitted that it would, despite the requirement of the LDP to build new homes, be contrary to the overall impression of the LDP to build on greenbelt in an area where that is part of the area's attraction.

Material considerations

Sections 25 and 37 of The Town and Country Planning (Scotland) Act 1997 require that material considerations are taken into consideration when considering a planning application.

In order for the developer to commence and complete the project, heavy plant vehicles would be needed in order to ensure that the site could be accessed, which would likely result in one half of the road (or part of it) on Glasgow Road being closed off to the public with temporary traffic lights having to be installed to combat this. Additionally, some home owners have to access their properties via Glasgow Road and thus, temporary traffic ordinances would naturally create difficulties for them in trying to park their vehicles at home. Problems would also arise for cyclists and pedestrians.

Long term this development would mean more cars on our roads, increasing the pressure on the already limited roads budget. If expenditure is not increased in line with the proposed number of houses it is likely that we will see further declines in the standard of East Renfrewshire's roads.

The 200 or so houses that Gladman are aiming to build would serve to increase the population of Waterfoot and put further pressure on school placements at a time when many residents are faced with difficulties in ensuring their children are given a place at their preferred schools.

Scottish Government advice on this matter (Circular 3/2013: Development Management Procedures) notes in Annex A that "[i]f the proposal does not accord with the development plan, it should be refused unless there are material considerations indicating that it should be granted". Applying said guidance to this development it is clear planning application should be refused: it is not mentioned in the LDP and there are no material considerations in support of it but rather many in opposition.

Allowing this development would create a precedent and make it difficult for ERC's planning authority to reject any future major residential planning applications on greenbelt (*Collis Radio v Secretary of State for the Environment*). It is not required that the planning application itself is objectionable (although this one is) for this material consideration to apply.

It must also be borne in mind that the fear of harm is a very real concern here. Despite previous assurances that the CALA Homes development was not the thin edge of the wedge we now have a major residential development nearby to that development. Therefore the fears of residents are not just based on assumptions but on the real impact that building homes in Waterfoot has had on the existing infrastructure framework.

Pre-Planning Consultation of Local Residents

At the end of 2016, I carried out a postal survey of residents living in Waterfoot in order to ascertain local opinion on Gladman's latest attempt to develop the land west of Glasgow Road. I surveyed 548 households and received 257 responses, which represents a 47% completion rate. The results showed that the overwhelming majority of participants in my survey exercise do not support the proposed development in Waterfoot as 253 (98%) stated that they are opposed it.

My survey also included a question asking residents whether or not they opposed or supported Gladman's previous attempt to build in this part of Waterfoot around two and a half years ago. In the same manner as the question asking them to give an opinion on the current proposed development, the vast majority (95%; 244 respondents) stated that they were against it. A number of participants made note that they did not live in Waterfoot at the time of Gladman's first proposal so could not provide a valid answer to this question, which largely accounts for the slight drop in percentage from the 98% who stated they did not support the organisation's latest plan to construct homes near Glasgow Road.

Furthermore, in the questionnaire I issued last year, I sought not only to determine whether residents were opposed to this project but to find out how they thought it would impact upon our area. In answer to the question 'On a scale of 1-5, where 1 means very negative and 5 means very positive, what sort of impact do you think the proposed development will have on the infrastructure supporting Waterfoot, its landscape and environment?', 241 (94%) out of the 257 participants responded that they felt its impact would be 'very negative'.

On the whole, these results strongly indicate that the people of Waterfoot have not changed their opinion on this issue; that we remain firmly opposed to any attempt from Gladman to develop the land west of Glasgow Road; and that we are extremely concerned about what effects it may have on our infrastructure, landscape and environment.

In addition, you may also recall that a previous survey I circulated to residents in 2014, which formed part of my objection to Gladman's previous planning application, showed broadly similar results with 52% of the survey population completing the questionnaire and with 292 of the 293 returned papers voicing opposition to development in Waterfoot.

Therefore, owing to the high turnout of both surveys and the similar results achieved, it is apparent that the people of Waterfoot do not support the housing plan put forward by Gladman and for as long as this remains the case, no such development programme should be given planning permission.

Please acknowledge safe receipt.

Yours faithfully

A handwritten signature in black ink, appearing to be 'J. Carlaw', written in a cursive style.

Jackson Carlaw MSP
Deputy Leader of the Scottish Conservatives
Shadow Cabinet Secretary for Culture, Tourism, Europe & External Affairs
Member of the Scottish Parliament for Eastwood

F: [@Jackson4Eastwood](https://twitter.com/Jackson4Eastwood)
T: [@Carlaw4Eastwood](https://twitter.com/Carlaw4Eastwood)
W: www.jacksoncarlaw.org.uk

