

## Planning Application EK/09/0218

### Representation by Jackton & Thorntonhall Community Council

December 2016

Jackton & Thorntonhall Community Council (JTCC) made representations (copy attached As Appendix 1) covering the previous version of this application. Most of those representations remain pertinent to the most recent version of the application and so, to avoid repetition, this representation should be read in conjunction with and as supplementary to our previous representation except where stated.

#### History of the Application

A previous version of the application was considered by South Lanarkshire Council in 2011 and, in our previous representation, JTCC pointed out that the proposal was not in accordance with the then current Local Development Plan which was finalised in August 2006 (LDP). Notwithstanding this, the Planning Committee was informed by the Executive Director (Enterprise and Resources) that:

*“there is considered to be no conflict with the Structure Plan or Local Plan in terms of the scale and phasing of the development”.*

No explanation was offered as to how this opinion could be reconciled with the LDP’s Policy STRAT 2 which states:

*“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.”*

It was further explained in paragraph 2.4 that:

*“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.”*

If this was not clear enough, it was accompanied by Table 2.2 which is reproduced overleaf.

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
Carlisle	500	-	500
<b>Total</b>	<b>6,500</b>	<b>2,000</b>	<b>8,500</b>

To provide guidance to developers of the East Kilbride CGA, the Council issued a Masterplan Development Framework (MDF) dated August 2007 which formed a “core document” at the examination of the LDP. The MDF clearly shows that there were to be two distinct phases of development with Phase 2, “post 2018” falling within the footprint of the current development proposal and representing a wide strip of land bordering Jackton Road. A copy of the relevant map is attached as Appendix 2.

It can only be concluded that the Executive Director (Enterprise and Resources) had not read the relevant sections of the LDP or, if he had, that he imagined that some housing land assessment had indeed confirmed the need for the post-2018 capacity (when none had done so). The other possibility, that he knowingly misled the Planning Committee, being unthinkable.

### Developments Since 2011

The application was approved in principle subject to the conclusion of satisfactory legal agreements. Fortunately, those agreements have never been concluded and, consequently, no planning permission has been granted.

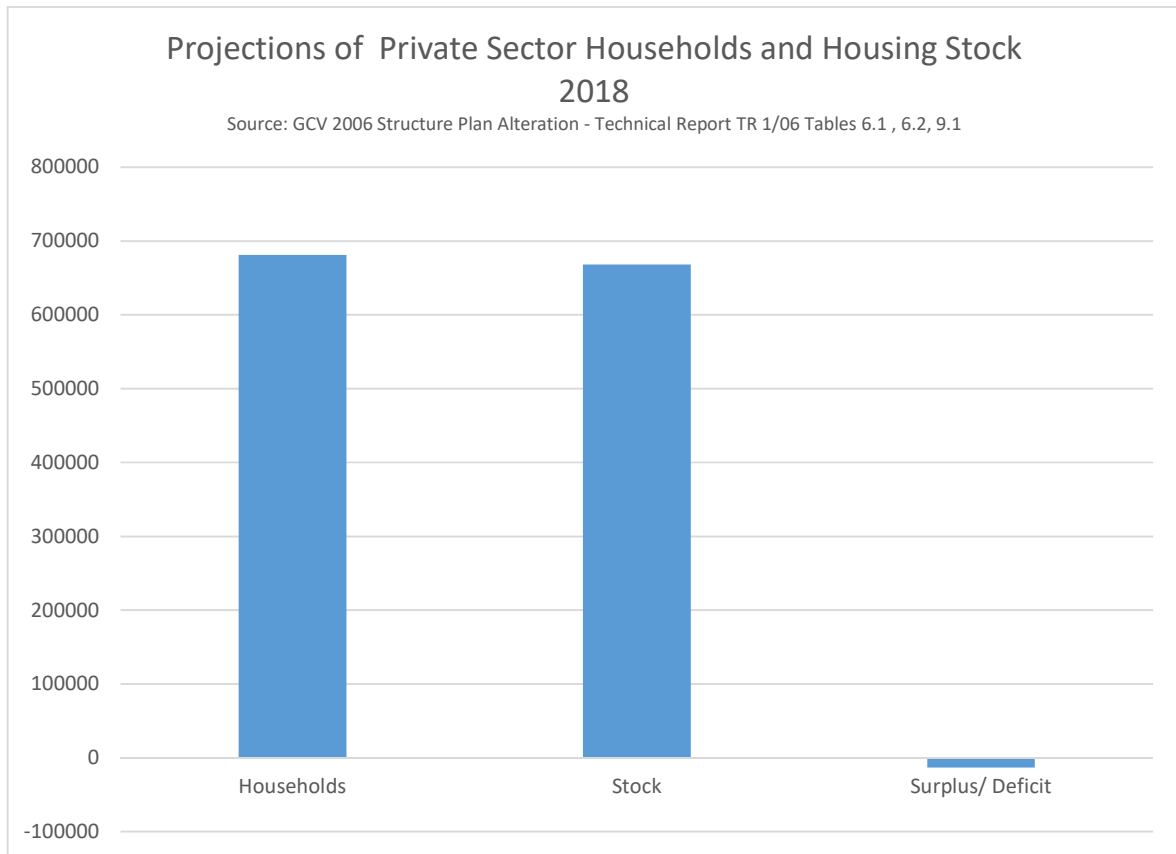
From discussions with representatives of South Lanarkshire Planning Department we understand that the potential developers of this site were not willing to meet the full cost of the infrastructure that the Council considered to be essential to the development (chiefly, a new spine road and primary school). We understand that there was partly a cash-flow problem (infrastructure spending well in advance of receipts from house sales) and partly an opportunity cost element (easier and more profitable opportunities on other sites). We further understand that South Lanarkshire Council is seeking to use money from the Glasgow City Deal to pre-fund the infrastructure spending and so “kick start” development of the East Kilbride CGA (amongst others).

JTCC considers that it is not surprising that developers are having difficulty in justifying a commitment to develop the whole site and that it is impossible to make a positive case for using public money to pay for infrastructure that is not currently and may never be needed. An examination of the trends in expected household growth will explain our reasons.

### Changes in Projected Private Sector Households

The East Kilbride CGA, of which this application represents a part, has its genesis in the Glasgow & Clyde Valley Structure Plan Alteration 2006 (the Structure Plan). The Structure Plan identified a prospective shortage of private sector housing land that would appear between 2011 and 2018. Community Growth Areas (CGAs) were intended to rectify this shortfall. The East Kilbride CGA was intended partly to meet a shortfall of housing land in the East Kilbride Housing Market Area (HMA) and partly to satisfy mobile demand in the Central Conurbation of which East Kilbride HMA forms a part.

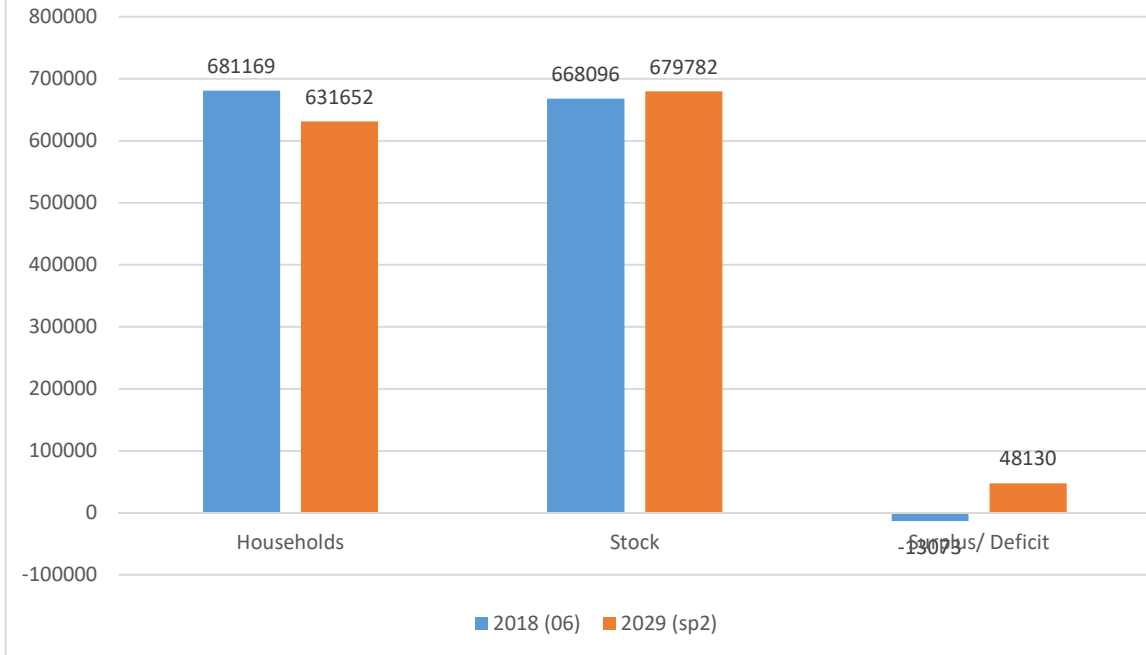
The Structure Plan projected that private sector households across the region would reach over 680,000 by 2018 and, since the projected supply of private sector housing stock amounted to only 668,000 units, there would have been a significant undersupply of housing unless additional housing land (the CGAs) was added to the supply.



Since then, however, expectations of the growth of private sector households have been significantly reduced. The following graph compares the latest projections contained in the proposed Glasgow & Clyde Valley Strategic Development Plan (Clydeplan 2) [orange bars] with those in the Structure Plan [blue bars].

## Projections of Private Sector Households and Housing Stock 2018 and 2029

Sources: GCV 2006 Structure Plan Alteration - Technical Report TR 1/06 Tables 6.1 , 6.2, 9.1 and Clydeplan 2 Housing Need & Demand Assessment Final - Figure 5.6 Tables 5.9, 5.10



Clydeplan 2’s projections show that private sector households will only reach 630,000 by 2029 – that is 50,000 fewer than the Structure Plan had projected to 2018. On the supply side, the housing stock is projected to be higher in 2029 than it was in 2018 (although, curiously, the increase is less than would have been expected by adding the total CGAs [22,100 units]<sup>1</sup>). As a result, what had been projected to be a 13,000 unit shortfall in 2018<sup>2</sup> is now expected to be a 48,000 surplus in 2029.

**It is clear that, had the Structure Plan used the Clydeplan 2 Household projections, there would have been no reason to create the CGAs because the then projected housing stock would have been more than sufficient to meet demand.**

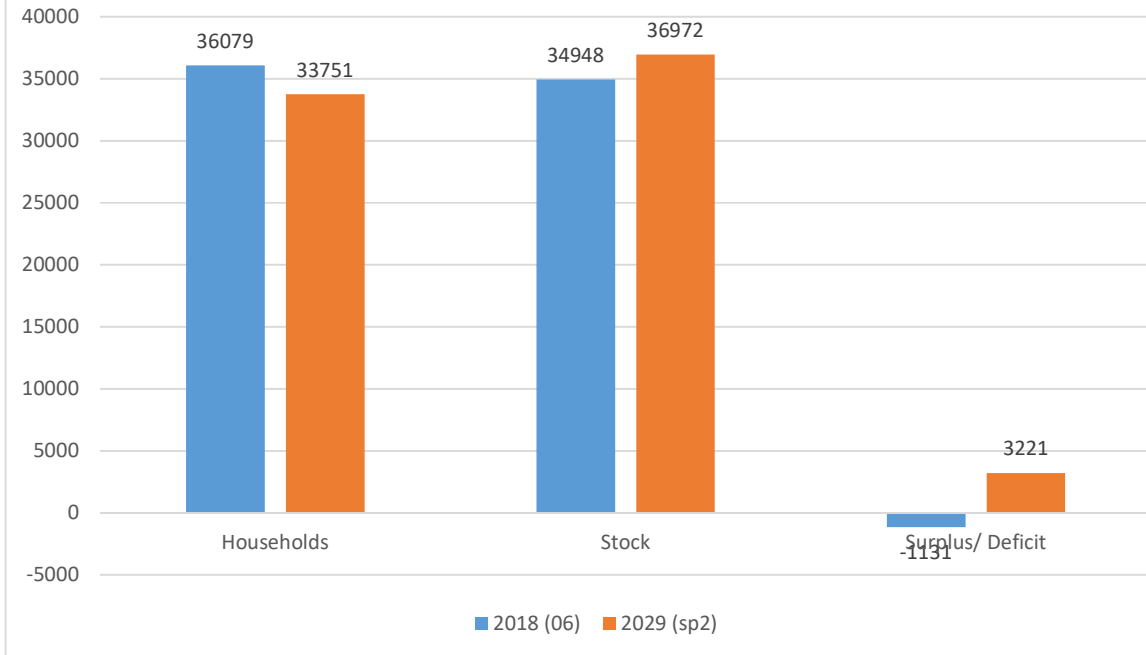
The following graph shows that the same pattern applies to the East Kilbride Housing Market Area.

<sup>1</sup> The reason appears to be that Clydeplan 2 assumes that some of the CGAs and other subsequent additions to the housing land supply additions will not enter the potential housing stock until after 2029.

<sup>2</sup> The identified housing land shortage was set at 19,000 units because local surpluses in some HMAs could not be used to satisfy mobile demand elsewhere.

## Projections of Private Sector Households and Housing Stock 2018 and 2029 - East Kilbride HMA

Sources: GCV 2006 Structure Plan Alteration - Technical Report TR 1/06 Tables 6.1 , 6.2, 9.1 and Clydeplan 2 Housing Need & Demand Assessment Final - Figure 5.6



Here too, projected household numbers have fallen and projected housing stock has increased (albeit by less than would have been expected in view of the capacity represented by the CGA (2,500 units) and the additions made in the most recent South Lanarkshire Local Development Plan [approved in 2014] (959 units).

**There is ample capacity to meet current expectations of household growth in East Kilbride to 2029 and beyond even if the CGA was to be removed from the housing stock projections entirely.**

For the sake of completeness, it should be noted that Clydeplan 2 projects significant local surpluses in all the HMAs that make up the Central Conurbation with the result that mobile demand within the conurbation is bountifully covered.

### Glasgow City Deal

South Lanarkshire Council has sought funds from the Glasgow City Deal in order to “kick start” the development of the East Kilbride CGA (and three others). From discussions with representatives of South Lanarkshire Council we understand that Council considers that City Deal cash, if used to pre-fund the infrastructure required for the CGA, would generate a positive return on the investment. We understand, however, that the anticipated positive return is based on an assumption that, without this investment (the “do nothing” scenario), the output of private sector housing in East Kilbride would fall below its potential. Specifically, the returns projected for the CGA investment are based on the first Glasgow & Clyde Valley Strategic Development Plan (Clydeplan 1) housing need and demand statistics which are now out of date.

It is clear from Clydeplan 2 projections discussed in the previous section that failure to develop the East Kilbride CGA would not lead to any shortfall in private sector housing output (at least up until

2029) because output will be determined by demand (growth in households)<sup>3</sup> and there is ample housing land available to meet this demand without the CGA. We understand, indeed, that a recent “call for sites” in advance of the forthcoming revision of the LDP has resulted in sites offering significant additional housing land being put forward around East Kilbride.

It is not surprising that the prospective developers of the CGA have been reluctant to commit to providing the infrastructure required up front because they are well aware that demand for private sector housing in East Kilbride is limited and that the CGA would be competing for sales with other sites in the area.

It is also questionable whether the requirement for a new primary school to serve the CGA is a necessary one given that the number of children aged 0-15 in South Lanarkshire is expected to be static or falling up to 2027<sup>4</sup>. A less wasteful strategy might, perhaps, be to focus on taking housing development to where primary school capacity already exists rather than creating a new school that would remain under-utilised for decades or, possibly, indefinitely.

### JTCC’s 2015 Proposals

It was for these reasons and in the hope of breaking a deadlock that was of benefit to no party, JTCC proposed in October 2015<sup>5</sup> that South Lanarkshire Council work with JTCC and the potential developers of the CGA to define a revised and smaller CGA that would be economically attractive to developers, generate development of a scale more appropriate to current conditions, reduce uncertainty for land owners, residents and developers, retain a larger and stronger green belt for the western edge of East Kilbride and eliminate or significantly reduce the need for public money to be used to provide infrastructure. We understand that South Lanarkshire Council did put these proposals to the CGA potential developers but that they were not willing to enter into any such discussion at that time.

### Current Application

We note that the latest application now proposes that this part of the CGA be developed in three phases with the first phase to consist of 389 private houses and 9 affordable houses. It is envisaged that these units could be constructed without the requirement for a spine road and that the primary school pupils could be accommodated at Mossneuk primary school. While the positioning of the eastern part of the phase could be improved (by being brought closer to the present Newlands development) and the balance between private and affordable housing is not in accordance with the Council’s policies, this phase comes close to the ideas that JTCC proposed for a smaller, more viable CGA.

### Conclusion

**JTCC cannot support this application as it currently stands because it does not conform to the LDP, because the scale is ill-matched to reality and because it would require expenditure of public money that would be unlikely to generate a positive return for the public on any realistic timescale.**

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<sup>3</sup> Projected to average just over 160 units p.a. up to 2029

<sup>4</sup> Source: <https://www.nrscotland.gov.uk/files//statistics/population-projections/2012-based-subnational/12pop-proj-scottishareas-table3.pdf>

<sup>5</sup> Copy attached as Appendix 3

## JTCC Proposal

JTCC proposes that South Lanarkshire Council

- Rejects the current application but,
- Indicates to the developers that it would look favourably on a suitably revised application for what is Phase 1 of this application
- Uses the forthcoming new LDP to return as much of the remaining site to green belt status as practical and, as a bare minimum, that part of the site that is marked as “Phase 2” in the MDF
- Withdraws its application for City Deal funds to support the development of the East Kilbride CGA

This proposal has the following benefits:

1. Allows development of the site to start without the need to make large infrastructure commitments up front
2. Eliminates the need for City Deal cash to support the development thereby freeing it up to be spent on genuinely beneficial projects
3. Allows the return of part of what is the sensitive East Kilbride-Jackton green belt wedge and East Kilbride-Clarkston-Eaglesham-Newton Mearns structural corridor to green belt status
4. Removes or reduces the adverse impact of the development on the conservation village of Eaglesham
5. Reduces the adverse impact of development on the setting of listed buildings at Lawside, north Craighall and Newhouse
6. Reduces uncertainty for landowners, householders and businesses within and around the CGA
7. Conforms more closely to Scottish Government Planning Policy that emphasises sustainable development

It is, of course, possible that expectations of private sector household growth will accelerate again in future. Such an eventuality may yet require the development of the whole of the CGA site but it will be for future Development Plans to make the case for this. To retain the whole of the CGA in the housing land supply “just in case” is neither necessary nor desirable.

**Application No: EK/09/0218**  
**Response of Jackton & Thorntonhall**  
**Community Council**  
**October 2011**



## Appendix 1

Jackton & Thorntonhall Community Council (JTCC) considers that this planning application is inappropriate and should be rejected for the following reasons:

### 1. Not Consistent with the Local Plan

The East Kilbride Community Growth Area, of which this application forms a major part, was identified in the 2006 Glasgow & Clyde Valley Structure Plan Alteration (the Structure Plan) as one of a number of sites required to meet an anticipated shortfall in housing land supply between 2011 and 2018 and was duly adopted in the South Lanarkshire Local Plan that was approved in early 2009 (the Local Plan).

Table 2.2 of the Local Plan sets out details of the Community Growth Areas (CGAs) and shows the East Kilbride CGA to have a capacity for 1,500 units up to 2018 with a further 1,000 units post 2018. Section 2.2 Of the Local Plan explains "*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.*" Section 2.2 further states that "*Should it be demonstrated that these long term requirements are not proven, land will be returned to the Green Belt as appropriate.*"

The Glasgow & Clyde Valley Housing Need & Demand Assessment (HNDA) was published in June 2011. Tables 8.5 and 8.6 of the HNDA demonstrate that there is projected to be a healthy surplus of private sector housing land at each of the sub-markets, 2nd Tier Market Areas, and First Tier Market Areas at both 2020 (Table 8.5) and 2025 (Table 8.6)<sup>6</sup>. These numbers demonstrate that the "long term requirements" for additional private sector housing land are not proven. Consequently the East Kilbride CGA is required to have capacity for no more than 1,500 units.

The current application is for 1,950 units, and there is also a pending application for 400-450 units on another part of the CGA (EK/11/X0204/New) while a further developer has yet to submit proposals for the remaining part of the CGA site (potential capacity c. 80 units). If both of the currently pending proposals were to be approved then the joint capacity would be 2,350 - 2,400 units - significantly in excess of the 1,500 units sanctioned by the Local Plan.

In its present form, therefore, the current application is not consistent with the Local Plan and should be rejected for this reason.

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<sup>6</sup> As South Lanarkshire Council is aware, these surpluses are understated by around 4,000 units in South Lanarkshire and around 16,000 units across the whole of the GCV area. This understatement arises from timing anomalies in the compilation of housing supply numbers at March 2009. These anomalies are the subject of an, as yet, unresolved representation by JTCC on the GCV Strategic Development Proposed Plan.

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### 2. Not Consistent with the Masterplan Development Framework

The Masterplan Development Framework (MDF) for the East Kilbride CGA clearly sets out in section 4.8 on page 24 which parts of the CGA are to be considered as Phase 1 (pre 2018) and Phase 2 (post 2018). The current application includes that part of the site that is shown in the MDF as being Phase 2.

Section 4.3.6 of the MDF deals with housing densities. It specifies that "*lower density development will be located between the open space spine and the green belt.*" The current application, however, does not conform to this - according to the diagram accompanying section 5.5 of the proposed Development Framework there would be a patchwork of lower and medium density housing widely distributed throughout the proposed development. Furthermore, whereas the MDF specifies a small proportion of higher density development located at the local centre at Jackton, the current proposal suggests higher density housing will be located in the centre of the site well away from the existing village of Jackton.

In these important respects the current proposals differ significantly from the letter and the spirit of the MDF and should be rejected accordingly.

### 3. Other Considerations

Although the proposed development conforms in part to the Local Plan JTCC considers that approval of a development of this size would have a number of adverse consequences that have not been properly considered.

1. Section 5.1 of the applicant's Master Plan Report indicates that a new primary school will be built before occupancy of the 401st house built on the CGA and that it will be built in phases. It is not clear whether this statement refers to the occupation of the 401st house on the CGA or whether it refers to the occupation of the 401st house on this part of the CGA. In either event it is clear that there will be a period of time during which primary school children from 400 (or possibly more) new households will need to be educated elsewhere. The closest facility would be Mossneuk Primary but this is understood to be already running at full capacity. The requirement to transport young children to distant schools would be both environmentally damaging and inconvenient to the children and their parents. Furthermore, although the applicant suggests that around 100 houses per annum will be built on this part of the CGA there can be no certainty, given current housing market conditions, that this timetable will be met. Accordingly, there can be no certainty as to when or even if the primary school on the CGA site will be built.
2. The proposed development would greatly increase traffic on Eaglesham Road due not only to the proposed development itself but also to the fact that the new feeder road would draw traffic on to Eaglesham Road from Lindsayfield and possibly also from the Greenhills area as this would provide an easier passage to the GSO than the alternative routes.
3. There would be an inevitable increase in vehicles using the conservation village of Eaglesham as a route to the GSO.
4. There would need to be a heavy reliance on subsidised buses in order to provide a viable alternative to use of motor cars. This is because:
  - a. Car parking facilities at Hairmyres Station are already inadequate.

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- b. There is limited spare capacity on the rail service between Hairmyres and Glasgow Central. This is due to the single track line between Busby and East Kilbride making improved service frequency impractical.
  - c. Bus operators will require a subsidy in order to provide a suitably frequent service.
  - d. The existing bus service between Eaglesham and Hairmyres would be inadequate to cope with likely demand.
5. Development of such a large green field site, even if undertaken over fifteen years or more, would inevitably nullify or, at best, delay the start of competing brown field developments - contrary to Scottish Planning Policy.
  6. The developers state that the total cost of the development will be c. £400m. In order to obtain a reasonable return on investment the developers will need to target gross revenues from sales of around £500m. Assuming that 500 units out of the total are to be "affordable" and assuming an average selling price for these units of £75,000 per unit this would generate gross revenues of £37.5m leaving £462.5m to be raised from the sale of the remaining 1,450 units. This arithmetic implies that the average selling price per unit would have to be around £319,000. It is doubtful whether such a price point would be affordable by the average single-adult household (which represents the majority of the projected increase in households over the next 20 years). While it is appreciated that the Council is not required to prevent developers from committing commercial suicide it is required to procure developments that are appropriate to the nature as well as the quantum of projected demand.

### Required Modifications

If, notwithstanding the points raised above, South Lanarkshire Council is minded to approve this application then JTCC urges that the developers be required to make the following modifications to the proposals as a condition of approval:

1. A reduction in the area covered by the proposed development so that it is consistent with Phase 1 (pre 2018) as shown on the map on page 24 of the Masterplan Development Framework. This modification is required because the South Lanarkshire Local Plan commits to returning that part of the CGA shown as Phase 2 on the map on page 24 of the MDF to green belt status unless the supply/demand situation post 2018 indicates a continuing requirement for housing on green belt. As noted above the latest HNDA indicates no such requirement.
2. The re-phasing of development in line with the preceding point so that those parts of the site adjacent to East Kilbride are developed first. Failure to make this change would risk leaving an irregular and potentially indefensible green belt boundary should later stages of the development prove to be uneconomic.
3. The identification of a potential strong and defensible Green Belt boundary for Phase 1 of the proposed development. This is important because that land identified as Phase 2 in the MDF should be returned to Green Belt Status in the next local plan. JTCC considers that there is a strong case to be made for utilising the proposed feeder road as the contingent western Green Belt Boundary for pre-2018 development.
4. The removal from the application of all land that does not form part of the East Kilbride CGA as defined in the south Lanarkshire Local Plan – in particular that tongue of land

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that extends from the west side of Jackton Road towards West End Farm and Eaglesham Road.

5. The re-siting of the Primary School away from Jackton Road. Failure to do this will result in a large number of vehicles using Jackton Road to drop or collect schoolchildren. Jackton Road is not suitable for this since it is narrow and there are few suitable turning points. In addition, the currently proposed location is not in phase 1 of the CGA per the MDF and would, therefore, be on land to be returned to the green belt.
6. Alteration of road layout. These proposals appear to have the feeder road joining Eaglesham Road at a point where there is no opportunity to connect to the northern part of the CGA. This is a wasted opportunity which should be remedied by moving the junction further East (towards the Police College) where access to the northern part of the CGA would be feasible. In order to provide safe passage for pedestrians across Eaglesham Road it will be necessary either to provide one or more footbridges or, preferably, to ensure that all road junctions are controlled by traffic lights linked intelligently.
7. The alteration of the proposed house types to conform more closely to the Masterplan Development Framework which calls for relatively high density housing for the reasons set out in paragraph 4.1.1 The types of housing set out in paragraph 4.3.2 of the MDF include semi-detached, terraced and flatted styles in addition to the detached properties on which the application is chiefly focused. The application states that “current research confirms a lack of demand for flatted accommodation and ongoing demand for detached homes” (applicants’ Master Plan Report Section 5.5) but, since no flatted properties exist in this location at present, it is unclear how this conclusion can have been reached. Furthermore, the projected increase in households which represents the marginal demand for housing for which the CGA is intended to augment existing supply consists overwhelmingly of single-adult occupants with a majority of these households headed by a person aged over 65. The requirement, therefore, will be for relatively inexpensive properties hence the MDF’s focus on relatively high density is appropriate.
8. The inclusion of adequate formal outdoor recreation facilities (e.g. Soccer, Rugby, Hockey, Cricket pitches, tennis courts, mountain bike or skateboard courses) within the development area. The MDF calls for the equivalent of at least one grass soccer pitch but the current proposals state that “no formal recreation facilities will be provided within the CGA.” JTCC considers that it is vital that at least some outdoor recreation facilities should be provided on-site if the development is to be consistent with sustainable development principles. Having facilities locally will encourage participation by those who might not be motivated to travel outwith the locality for recreation and also reduce carbon emissions arising from such journeys by those who do participate.
9. The inclusion of adequate indoor leisure and recreation facilities within the development site. JTCC considers that, as a minimum, a development on the scale proposed requires a branch library and a community centre of sufficient size and flexible design to be suitable for a wide variety of uses.
10. The specification of as high a proportion of locally-sourced or locally recycled building materials as is feasible in order to reduce the carbon footprint of the development.
11. The reservation of at least 25% of the construction jobs on the site for those living within a five mile radius of the development.

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12. A commitment by the developers to utilise local sub-contractors where feasible.
13. The inclusion in the plans of some form of local power generation – preferably of renewable type as specified in the MDF. Some parts of the site may be suitable for small scale wind turbines (as the MDF proposes) but alternative solutions such as a biomass-burning CHP plant utilising locally-sourced materials may be a preferable and more economical alternative.
14. A commitment by the developers to connect all existing properties within and immediately adjacent to the development area to the main sewerage system (subject to owners' consent) at the expense of the developers.
15. A commitment by the developers to connect all existing properties within and immediately adjacent to the development area to the gas main system (subject to owners' consent) at the expense of the developers.
16. Provision by the developers (in conjunction with BT) of high-speed "fibre to the kerb" telecoms connection for all properties (new and existing) within and immediately adjacent to the development area. This is best practice for all new developments and is important for encouraging home working and reducing carbon emissions associated with commuting.
17. A commitment by the developers to retain all existing trees and hedgerows within the area of the development. Where it is necessary to remove sections of hedgerows to gain access while building work is undertaken full reinstatement should be required. This is necessary in order to preserve the feeding grounds of the bat colonies that are known to exist within the development area.
18. JTCC also recommends that approximately 20% of the development should consist of sheltered housing to meet the demands of an ageing population.
19. JTCC would also like to see some parts of the development – up to 40% - devoted to vehicle-free housing.
20. In order to retain the rural character of Jackton Road all boundary plantings should be non-permeable.

## Appendix 2

### East Kilbride *Masterplan Development Framework*

#### 4.8 Phasing/ Delivery Mechanisms

##### Phase 1

This phase will see the completion of development already underway at Hayhill Road/ Peel Road. The key milestones associated with this phase are the development of the proposed local centre and the primary school at Jackton village. This phase will also see the completion of the new distributor road serving the CGA and linking Jackton to Lindsayfield, and a possible new link to Greenhills Road.

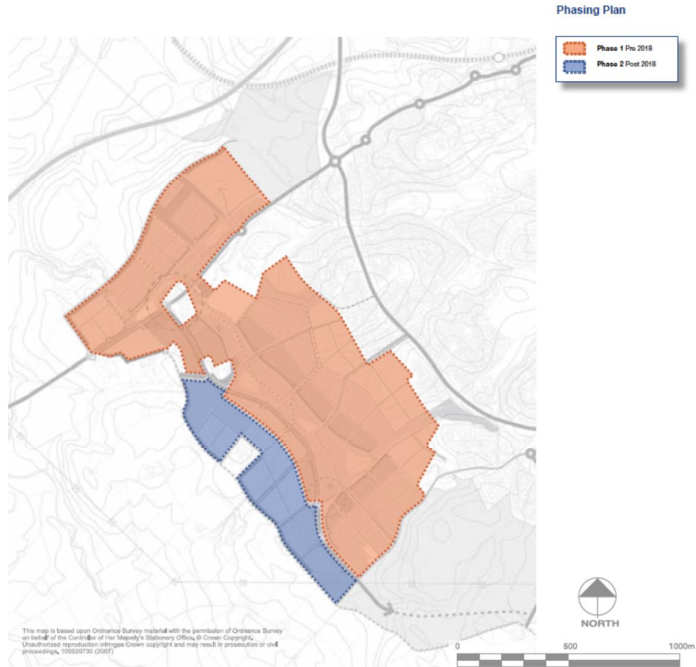
This phase will also see the full implementation of the central landscaped park adjacent to the distributor road, proposed SUDS infrastructure and the development of housing framing the central space. A secondary local centre may be developed to support 1,500 units.

This phase will commence pre 2018.

##### Phase 2

This phase would see the overall completion of the CGA. It will be released subject to supply and demand assessment after 2018. It would complete development to the settlement boundary of Jackton Road.

The Council will take action as necessary to ensure the effective delivery of the infrastructure improvements identified as part of the Local Plan process. In specific relation to the requirements for third party land (e.g. for road infrastructure improvements), whilst this should preferably be delivered through negotiations, if necessary the Council would consider using appropriate legislation and powers to secure such land.





ADMIN

**THE EAST KILBRIDE COMMUNITY GROWTH AREA HAS NOT FULFILLED ITS PURPOSE. THIS PROPOSAL OFFERS A MEANS OF FACILITATING AN APPROPRIATE LEVEL OF DEVELOPMENT FOR THE AREA AND WITHOUT THE REQUIREMENT FOR MAJOR PUBLIC SUBSIDY.**



## Summary

### Background

The East Kilbride Community Growth Area (EKCGA) came into being as a result of the Glasgow & Clyde Valley Structure Plan Alteration 2006 (Structure Plan) which projected that a shortage of private sector housing land in the region as a whole would develop between 2011 and 2018. The Structure Plan projections showed that there was a surplus of housing land to meet local demand up to and beyond 2018 in East Kilbride so the EKCGA was designed to remedy a shortfall in mobile demand that was expected to arise at the second and first tier housing market areas. The subsequent South Lanarkshire Local Development Plan incorporated the EKCGA and defined its location.

### Subsequent Developments

Various plans have been submitted for developing the EKCGA. Most recently plans for the Southern and Northern segments (covering the majority of the site) were given conditional planning approval in principle in late 2011 and early 2012 respectively. To date, however, the conditions of approval have not been met and no development has resulted.

It was announced in 2014 that South Lanarkshire Council (SLC) had proposed that funds from the “Glasgow City Deal” (a £1.13bn infrastructure commitment) be used to “kick start” development of four CGAs including the EKCGA. A formal Strategic Business case for a number of projects including the SLC CGAs was submitted by SLC in August 2015. In the case of the EKCGA, SLC sought funding of £19.4m to cover investment in roads, community facilities and education.

Since the projects that make up the “Glasgow City Deal” were first identified in 2013 the Glasgow & Clyde Valley Strategic Development Authority has released its “Main Issues Report” in advance of the publication of a new Strategic Development Plan in 2016. Background Reports for the Main Issues Report show that there is now projected to be a substantial surplus of private sector housing land across the region as a whole at least as far as 2029. Compared to 2006, there has been a modest increase in housing land (excluding the CGAs) but the main difference is that private sector household projections have fallen dramatically. As a result, the urgency to develop the CGAs has receded.

### Unintended Consequences

Residents and landowners in and around the EKCGA have had nearly ten years of uncertainty as to when or if CGA development would take place. We understand from discussions with representatives of SLC that their expectation is that it could take at least another decade before development might become viable. Latest household projections suggest that even this view may prove to be overoptimistic. Uncertainty, therefore, seems likely to remain for the foreseeable future. Planning is, of course, intended to reduce uncertainty and to provide a clear and reasonable framework for development. Uncertainty is undesirable both economically (reducing the incentive to invest in or maintain productive assets, reducing liquidity in the housing market) and socially (making it difficult for households to move into or out of the affected area).

### Proposal

**JTCC proposes that SLC re-considers the extent of the EKCGA which, as currently defined, is larger than now required, larger than developers currently prefer and expensive to develop. We recommend that SLC now consults with the developers and JTCC to define a smaller, more appropriately sized and more economically attractive developable area. SLC could then withdraw or substantially reduce its request for funding of the EKCGA under the Glasgow City Deal. The next**

## Appendix 3

**Local Development Plan could be used to return the remaining parts of the existing CGA to its previous green belt status.**

### Advantages of the Proposal

- Provides a site for housing that would be economical to develop and require little or no public subsidy
- Reduces uncertainty for residents, landowners and developers
- Achieves development that would be more proportionate to the scale of the existing settlement
- Frees up Glasgow City Deal funds for more beneficial infrastructure investments
- Retains a larger and stronger green belt for the western perimeter of East Kilbride

## Background

The East Kilbride Community Growth Area (EKCGA) came into being as a result of the Glasgow & Clyde Valley Structure Plan Alteration 2006 (Structure Plan) which projected that a shortage of private sector housing land in the region as a whole might develop between 2011 and 2018. The Structure Plan projections showed that there was a small surplus of housing land to meet local demand up to and beyond 2018 in East Kilbride so the EKCGA was designed to remedy a shortfall in supply to meet mobile demand that was expected to arise at the second and first tier housing market areas. This is demonstrated in Table 9.2 of Technical Report TR 1/06 of the Structure Plan which is reproduced as Appendix 1.

Although the Structure Plan identified a potential shortage of private sector housing land by 2018 it also acknowledged that this deficit was likely to be exaggerated because:

1. It was expected that additional “windfall” housing sites would naturally come forward before 2018 (see Structure Plan paragraph 8.12), and
2. It was acknowledged that density assumptions in the then housing land supply were likely to prove to be “conservative” (i.e. to understate the true capacity of housing sites in the land supply) [see Structure Plan paragraph 12.10].

Consequently the Structure Plan introduced the concept of Community Growth Areas more as a prudent precaution against a capacity shortfall arising rather than as development priorities. This caution was driven partly by Scottish Government Policy which then, as now, gave priority to regeneration of previously developed sites over development of green field sites (which all the CGA sites are). This point was made very clearly in paragraph 12.9 of the Structure Plan which stated: *“The recycling of brownfield land and the implementation of a strong Green Belt policy underpin the Metropolitan Development Strategy. Strategy Policy 9B (ii) therefore requires that priority continue to be given to the recycling of urban land in preference to greenfield sites in the provision of future housing.”*

Dealing specifically with the CGA sites, paragraph 12.14 of the Structure Plan stipulates *“Whilst talking (sic) account of the need to ensure priority is given to the reuse of brownfield land, local plans should make specific provision, if necessary by greenfield release, for approximately 19,400 houses: 4,100 houses additional to the effective supply pre-2011 and 15,300 houses additional to the established supply post-2011...”* (underlining added).

While the Structure Plan specified that 19,400 additional housing units should be added to the Housing Land Supply by 2018, the identified capacity of the CGAs (in aggregate) amounted to 22,200 units (see Structure Plan Schedule 1c.). So there was provision for 2,800 more units than the Structure Plan itself considered to be necessary.

The subsequent South Lanarkshire Local Development Plan incorporated the EKCGA and defined its location. In doing so, the plan made clear that the EKCGA had potential capacity for up to 2,500 units but acknowledged that only 1,500 units of this CGA would be required to meet the 2004-2018 housing land shortfall identified in the Structure Plan (See Appendix 2). It was stated, accordingly that *“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.”* (Policy STRAT 2). Furthermore, *“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*

### Appendix 3

Belt as appropriate." (Local Plan Paragraph 2.4, underlining added). The most recent South Lanarkshire Local Development Plan, adopted in 2015, made no change to the previous Plan's policy in relation to the CGAs.

During the Public Local Inquiry of the Plan that incorporated the CGAs South Lanarkshire Council lodged as a "core document" a Masterplan Development framework for the EKCGA which identified parts of the area of the EKCGA representing pre-2018 (phase 1) and post-2018 phase 2 developments. The relevant diagram is attached as Appendix 3.

#### Subsequent Developments

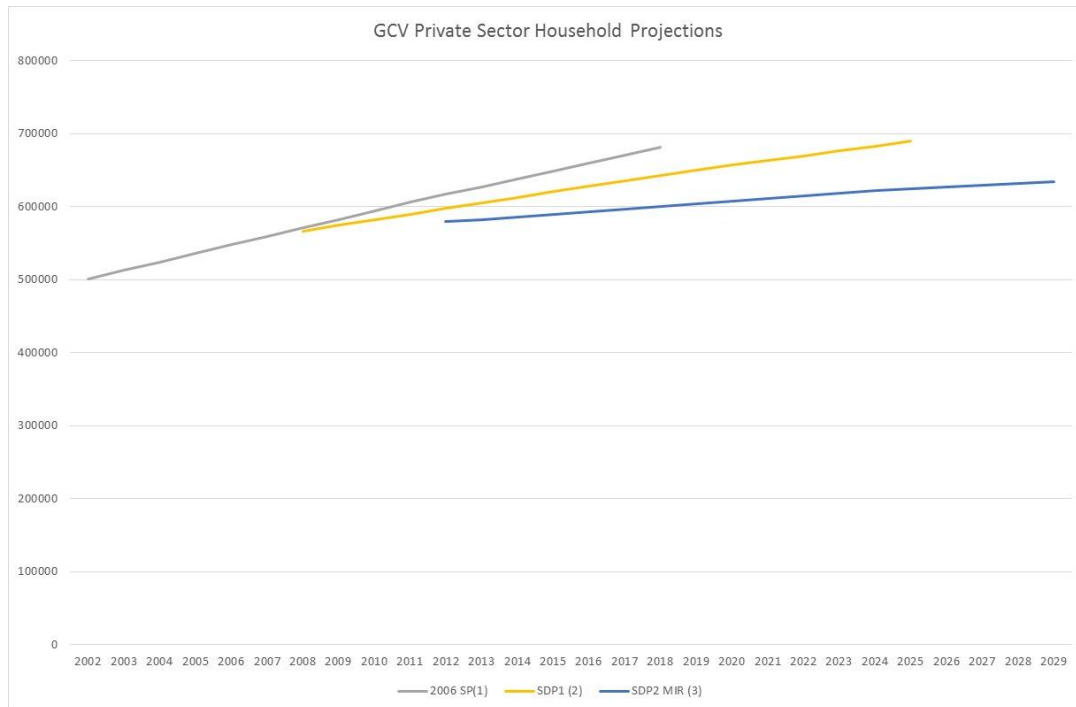
Various plans have been submitted for developing the EKCGA. Most recently plans for the Southern (EK/11/0202) and Northern (EK/11/0379) segments covering the majority of the site and consisting of 2,450 units in aggregate were given conditional planning approval in principle in late 2011 and early 2012 respectively. To date, however, the conditions of approval have not been met and no development has resulted. A further application for development on the remaining part of the EKCGA was submitted earlier in 2015 (EK/15/0078) but no determination has yet been made on this relatively small part of the EKCGA. It would appear that the potential developers of the major part of the EKCGA have been unwilling to agree to the conditions attached to the relevant planning approvals which were, chiefly, that they should provide a new spine road and a new primary school to serve the proposed development. It seems reasonable to assume that the developers have been unable to persuade themselves that proceeding with these proposals would be economically attractive to them at present.

It was announced in 2014 that South Lanarkshire Council (SLC) had proposed that funds from the "Glasgow City Deal" (a £1.13bn infrastructure commitment) be used to "kick start" development of four CGAs including the EKCGA. A formal Strategic Business case for a number of projects including the SLC CGAs was submitted by SLC in August 2015. In the case of the EKCGA, SLC sought funding of £19.4m to cover investment in roads, community facilities and education.

Although the Glasgow City Deal was only publicly announced in August 2014 the infrastructure projects (including the CGAs) were selected during 2013. At that time it would have been a reasonable assumption that capacity represented by the CGAs would be required to meet private sector housing demand up to 2024 as projected by the current Glasgow & Clyde Valley Strategic Development Plan (SDP1). Consequently there was reasonable justification for using City Deal cash to subsidise the infrastructure requirements for some of the "stalled" CGAs since doing so would help to ensure that these sites delivered the new houses required. This justification, however, has been overtaken and nullified by the publication of the Main Issues Report for the forthcoming update to the Glasgow & Clyde Valley Strategic Development Plan (SDP2) which contains fresh and much reduced projections for private sector household growth out to 2029.

The graph overleaf compares private sector growth projections from the 2006 Structure Plan, SDP1 and SDP2.

## Appendix 3



It is evident that the almost 700,000 private sector households projected by the Structure Plan and by SDP1 at their respective end dates of 2018 and 2024 will not now be achieved. SDP2 projects only around 635,000 private sector households by 2029. Clearly the need for additional 22,000 units of housing capacity represented by the CGAs which was first identified in the Structure Plan and affirmed in SDP1 (albeit at a later date) no longer exists.

The SDP2 numbers make it clear that no shortfall arises in any housing market area or at any housing market level. Table 8.8 of Technical Report TR 07 demonstrates this and is reproduced as Appendix 4. It is also the case that the local surplus of 3,221 units for East Kilbride HMA excludes additional housing capacity that was subsequently added to the Housing Land Supply through the latest South Lanarkshire Local Development Plan. This amounts to a further 959 units making the adjusted surplus for the East Kilbride HMA 4,180 units. So even if the entirety of the EKCGA were to be removed from the housing land supply there would still be a substantial excess of supply over expected local demand at 2029. This is shown in Appendix 5.

### Unintended Consequences

Residents and landowners in and around the EKCGA have had nearly ten years of uncertainty as to when or if CGA development would take place. We understand from discussions with representatives of SLC that their expectation is that it could take at least another decade before development might become viable. Latest household projections (see above) suggest that even this view may prove to be overoptimistic. Uncertainty, therefore, seems likely to remain for the foreseeable future.

Planning is, of course, intended to reduce uncertainty and to provide a clear and reasonable framework for development. Uncertainty is undesirable both economically (reducing the incentive to invest in or maintain productive assets, reducing liquidity in the housing market) and socially (making it difficult for households to move into or out of the affected area).

## Appendix 3

The main reason for identifying the EKCGA (and other CGAs) was to try to concentrate housing development on areas that were deemed to be the most suitable – whether through their transport links or for other reasons. Ironically, however, because the EKCGA is large, expensive and risky to develop the result has been that the planning authority has come under pressure to approve development on a series of smaller sites in the area. The more such sites are approved, the less attractive the EKCGA becomes to develop because local demand is being satisfied by alternative developments. Consequently, far from attracting development the EKCGA has had the effect of repelling it.

### Proposal

For the reasons set out above JTCC considers that the EKCGA, as presently defined, has failed to achieve its intended purpose. Furthermore, changes to expected patterns of private sector housing demand make it highly unlikely that it will do so in the foreseeable future.

Given the surplus of housing land currently available in the East Kilbride housing market area it is improbable that the use of Glasgow City Deal funding to subsidise development of the EKCGA could generate a positive return for the public.

There is a better way to resolve the problem of the EKCGA than by throwing public money at it.

The EKCGA is currently expensive to develop because its size requires a significant up-front investment in roads and a primary school. JTCC proposes that by reducing its size (capacity and area) it would be possible to reduce the development costs by using existing infrastructure more effectively. This would make it more attractive to developers and less likely to require any public subsidy. A smaller development would be of more appropriate scale to the existing settlements and more acceptable to residents.

As discussed above, the South Lanarkshire Local Plan that brought the EKCGA into being envisaged that it would be appropriate to return part of the area to green belt status unless there was a demonstrable need to retain it for development. It is clear that no such need exists or is likely to exist in the foreseeable future. It would, therefore, be entirely consistent with the Local Development Plan for South Lanarkshire Council to approve development on a reduced but appropriate area and to use the next Local Development Plan to return the remainder of the EKCGA to green belt status.

JTCC would be willing to work in conjunction with South Lanarkshire Council and the developers/site owners to define a reduced but potentially effective developable area within the EKCGA.

### Advantages of the Proposal

The JTCC proposal offers the following advantages:

- Provides a site for housing that would be economical to develop and require little or no public subsidy
- Reduces uncertainty for residents, landowners and developers
- Achieves development that would be more proportionate to the scale of the existing settlement
- Frees up Glasgow City Deal funds for more beneficial infrastructure investments
- Retains a larger and stronger green belt for the western perimeter of East Kilbride

## Appendix 3

### Appendix 3

#### Appendix 1 – Table Extracted from Technical Report TR 1/06 of the Glasgow & Clyde Valley Structure Plan Alteration 2006

<b>Table 9.2 - Comparison of Private Sector Supply and Demand, 2018</b>				
<b>STAGE1</b>	Locally Targeted	Effective Stock	Local Shortfall	Local Surplus
<b>Sub Market Area</b>	Demand at 2018	at 2018		
Greater Glasgow North & West	109,123	114,066	0	4,943
Strathkelvin & Springburn	36,199	37,172	0	973
Glasgow East	43,191	45,772	0	2,581
Cumbernauld	32,600	32,537	63	0
Greater Glasgow South	129,597	128,871	726	0
Renfrewshire	77,907	77,733	174	0
East Kilbride	34,788	34,948	0	160
Central Conurbation Total	463,405	471,099	963	8,657
Airdrie & Coatbridge	38,586	38,271	315	0
Motherwell	46,678	46,476	202	0
Clydesdale	23,072	23,882	0	810
Hamilton	40,742	40,871	0	129
Eastern Conurbation Total	149,078	149,500	517	939
<b>STAGE 2</b>	Mobile Demand	Local Surplus	Mobile Shortfall	Mobile Surplus
<b>2nd Tier Market Area</b>	at 2018	at 2018		
Central Conurbation	16,899	8,657	8,242	0
Eastern Conurbation	3,776	939	2,837	0
Conurbation Total	20,675	9,596	11,079	0
<b>STAGE 3</b>	Mobile Demand	Mobile Surplus	Mobile Shortfall	Mobile Surplus
<b>1st Tier Market Area</b>	at 2018	at 2018		
Conurbation	2,450	0	2,450	0
<b>Individual HMA</b>	Demand at 2018	Effective Stock at 2018	Shortfall	Surplus
Dumbarton & Vale of Leven	16,917	18,139	0	1,222
Inverclyde	28,642	29,358	0	716
<p>FOOTNOTE 1 Local Surplus : This is the balance of the projected stock which remains once local demand has been met. It does not imply a genuine surplus in the sense of empty housing. It is carried forward to Stage 2 where it helps to meet mobile demand in the wider market area. In effect, it represents, in net terms, the potential of each area to attract mobile demand.</p> <p>FOOTNOTE 2 Mobile Surplus : The mobile surpluses which emerge in the 2nd tier HMAs are carried forward to the 1st tier HMA.</p>				



### Appendix 3

#### Appendix 2 Extract from South Lanarkshire Local Development Plan 2006 (Finalised)

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
<b>Total</b>	<b>6,500</b>	<b>2,000</b>	<b>8,500</b>

## Appendix 3

### Appendix 3 – Extract From East Kilbride CGA Masterplan Development Framework

#### 4.8 Phasing/ Delivery Mechanisms

##### Phase 1

This phase will see the completion of development already underway at Hayhill Road/ Peel Road. The key milestones associated with this phase are the development of the proposed local centre and the primary school at Jackton village. This phase will also see the completion of the new distributor road serving the CGA and linking Jackton to Lindsayfield, and a possible new link to Greenhills Road.

This phase will also see the full implementation of the central landscaped park adjacent to the distributor road, proposed SUDS infrastructure and the development of housing framing the central space. A secondary local centre may be developed to support 1,500 units.

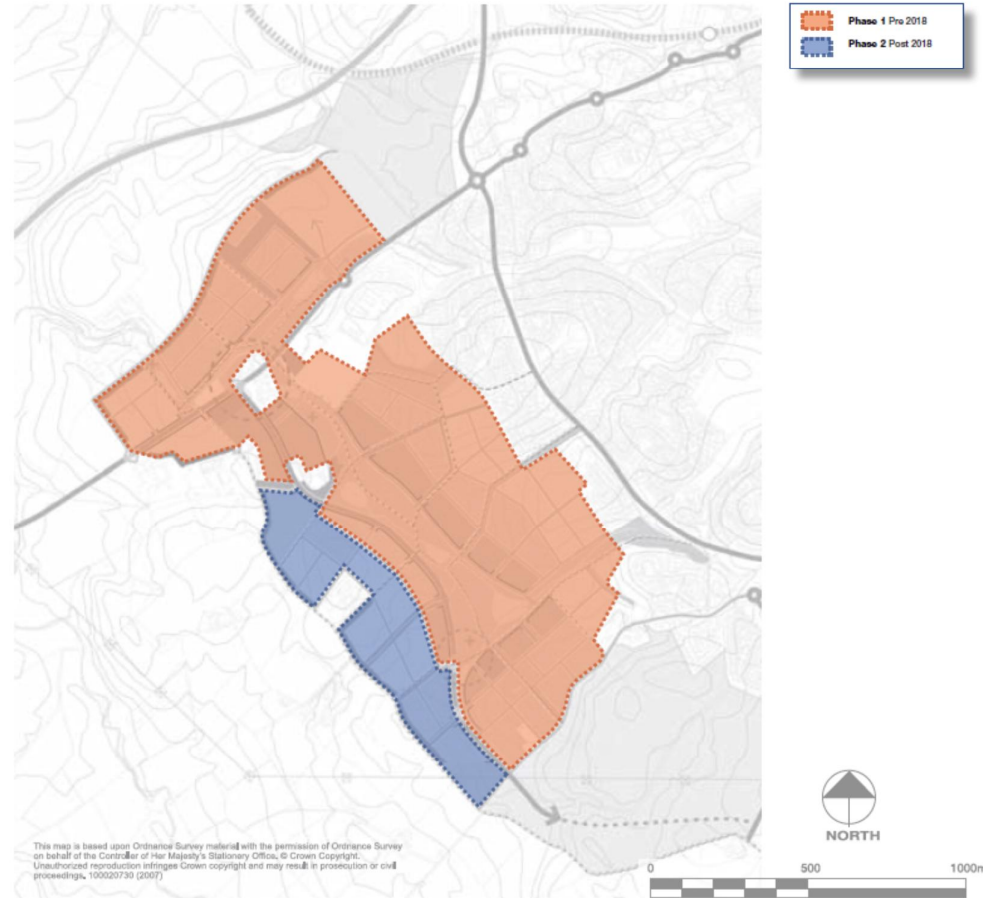
This phase will commence pre 2018.

##### Phase 2

This phase would see the overall completion of the CGA. It will be released subject to supply and demand assessment after 2018. It would complete development to the settlement boundary of Jackton Road.

The Council will take action as necessary to ensure the effective delivery of the infrastructure improvements identified as part of the Local Plan process. In specific relation to the requirements for third party land (e.g. for road infrastructure improvements), whilst this should preferably be delivered through negotiations, if necessary the Council would consider using appropriate legislation and powers to secure such land.

#### Phasing Plan



Appendix 3

**Appendix 4 Extract from Technical Report TR/07 of the Main Issues Report (2015) of the Glasgow & Clyde Valley Strategic Development Plan**

<b>Table 8.8 Comparison of Private Sector Supply and Demand at 2029 - Planning Scenario</b>				
<b>STAGE 1</b>				
<b>Sub-Market Area</b>	<b>Locally Targeted Demand at 2029</b>	<b>Effective Stock at 2029</b>	<b>Local Shortfall</b>	<b>Local Surplus</b>
	<i>A</i>	<i>B</i>	<i>C</i>	<i>D</i>
	<i>(Tb1 8.6 I)</i>	<i>(Tb1 7.2)</i>	<i>(=A-B)</i>	<i>(=B-A)</i>
1 Greater Glasgow North and West	101,099	107,150	0	6,051
2 Strathkelvin and Greater Glasgow North East	32,727	37,641	0	4,914
3 Glasgow East	39,726	48,632	0	8,906
4 Cumbernauld	30,475	34,931	0	4,456
5 Greater Glasgow South	126,528	130,475	0	3,947
6 Renfrewshire	75,597	83,251	0	7,654
7 East Kilbride	33,751	36,972	0	3,221
8 <b>Central Conurbation</b>	439,903	479,052	0	39,149
9 Airdrie and Coatbridge	34,727	36,395	0	1,668
10 Motherwell	43,107	51,343	0	8,236
11 Hamilton	37,314	41,112	0	3,798
12 Clydesdale	21,706	24,594	0	2,888
13 <b>Eastern Conurbation</b>	136,854	153,444	0	16,590
<b>STAGE 2</b>				
<b>2nd Tier Market Area</b>	<b>Mobile Demand at 2029</b>	<b>Local Surpluses at 2029 (from Stage 1)</b>	<b>Mobile Shortfall</b>	<b>Mobile Surplus</b>
	<i>(Tb1 8.6 I15, I16)</i>	<i>(Tb1 8.8 D8, D13)</i>	<i>(=A-B)</i>	<i>(=B-A)</i>
14 Central Conurbation	13,212	39,149	0	25,937
15 Eastern Conurbation	3,467	16,590	0	13,123
16	16,679	55,739	0	39,060
<b>STAGE 3</b>				
<b>1st Tier Market Area</b>	<b>Mobile Demand at 2029</b>	<b>Mobile Surplus at 2029 (from Stage 2)</b>	<b>Mobile Shortfall</b>	<b>Mobile Surplus</b>
	<i>(Tb1 8.6 I17)</i>	<i>(Tb1 8.8 F16)</i>	<i>(=A-B)</i>	<i>(=B-A)</i>
17 Conurbation	1,926	39,060	0	37,134
<b>Individual HMA</b>				
<b>Individual HMA</b>	<b>Demand at 2029</b>	<b>Effective Stock at 2029</b>	<b>Shortfall</b>	<b>Surplus</b>
	<i>(Tb1 6.3+ RTB Tb1 7.2)</i>	<i>(Tb1 8.8 F16)</i>	<i>(=A-B)</i>	<i>(=B-A)</i>
18 Dumbarton and Vale of Leven	15,247	17,867	0	2,620
19 Inverclyde	23,932	29,419	0	5,487
<b>GCV-wide position</b>				
20 Projected completions (12-29) included in above projected stock figures	99,735	<i>(Completions+HLA +UCS Tb1 7.2)</i>		
21 Sum of above surpluses/shortfalls	45,241	<i>(=C8+C13+C16+C17+D17+C18+D18 +C19+D19)</i>		
22 Required completions (12-29)	54,494	<i>(=A20-A21)</i>		
23 Required completions - annual	3,206	<i>(=A22/17)</i>		

Source: GCVSDPA, 2014. This table uses inputs derived from the HNDA Tool and GCVSDPA and is linked through the series of tables in Section 8 (linkages are shown throughout the tables).

Data for column A comes from Table 8.6, Table 6.3 plus RTB from Table 7.2. Data for column B comes from Table 7.2 plus internal calculations to Table 8.8. These results are the Adjusted Housing Estimates for the HMA framework. These results feed into estimates in Table 8.9, 8.10, 10.1 and Annex 4.

Table 8.8 provides the input for Core Output 2 in the HNDA Report 2015 Chapter 5, Figure 5.10.

<b>Private Sector Housing Surplus at 2029 (Source: TR 07 - Table 8.8)</b>					
<b>Stage 1</b>					
<b>Housing Sub-Market Area</b>	<b>Local Surplus</b>		<b>Deduct: CGAs</b>	<b>Add: LDP Additions</b>	<b>Adj Lo</b>
Greater Glasgow North and West	6051				
Strathkelvin and Greater Glasgow North East	4914				
Glasgow East	8906				
Cumbernauld	4456				
Greater Glasgow South	3947				
Renfrewshire	7654				
East Kilbride	3221		-2500	959	
<b>Central Conurbation</b>	<b>39149</b>		<b>-2500</b>	<b>959</b>	
Airdrie and Coatbridge	1668				
Motherwell	8236				
Hamilton	3798				
Clydesdale	2888				
<b>Eastern Conurbation</b>	<b>16590</b>		<b>0</b>	<b>0</b>	
<b>Stage 2</b>					
<b>Mobile Surplus</b>					
<b>2nd Tier Market Area</b>					
Central Conurbation	25937		-2500	959	
Eastern Conurbation	13123		0	0	
	<b>39060</b>		<b>-2500</b>	<b>959</b>	
<b>Stage 3</b>					
<b>Mobile Surplus</b>					
<b>1st Tier Market Area</b>					
Conurbation	37134		-2500	959	
Equivalent years of output (2012-29)	11.6		-0.8	0.3	