

STEPS & DISTRICT COMMUNITY COUNCIL

Working with North Lanarkshire Council for the Stepps Communities

- Stepps, Stepphill, Cardowan, Craigendmuir, Crowwood Grange, Coshneuk & Millerston -

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20/01359/MSC | Approval of Matters Specified in Conditions 1 and 4 of Planning Permission in Principle ref 16/01271/PPP - Residential Development. | Land To The North Of Cumbernauld Road And East Of Hornhill Farm Road Stepps North Lanarkshire

Stepps & District Council (S&DCC) **objects** to the above referenced MSC and requests that North Lanarkshire Council **refuses** permission for this development.

Introduction

This MSC application exemplifies many of the issues with speculative house building development at present in Scotland. The Scottish Government promotes house building as a driver for economic development, and as a result of this planning agents and housebuilders have been targeting development at sites within the Greenbelt, and despite refusal by Councils and very significant local opposition, many sites are approved for development at the appeal stage.

The housebuilders' priority is to maximise the development potential of a site, which can adversely affect the quality of the development. This has been recognised by the Scottish Government and Councils, and to encourage good design and raise the profile of design as an important issue, the Scottish Government has published PAN 67-Housing Quality and the Designing Streets Policy. Furthermore, North Lanarkshire Council has incorporated Policy DSP 4 into the Local Plan and the Supplementary Planning Guidance note SPG.15-Good Design Toolkit.

It is within this context that it is disappointing that the application for *Approval of Matters Specified in Conditions 1 and 4 of Planning Permission in Principle ref 16/01271/PPP - Residential Development*, has not changed significantly from the previous application, which was refused by the Council and notably by the Reporter at appeal.

On the basis of this, S&DCC request that the following matters be considered material with respect to this MSC application, and the application be refused.

Density of the Development. Proposed Site Layout 5991(3)SP007

There have been subtle alterations to the site plan from the proposed site layout of the previous refused application, as indicated on Site layout drawing 5722(3) SP500 Rev D. However, the number of units has only reduced by one, from 200 to 199 units. Comparing the two site plans the main changes have been introduced along the Cumbernauld Road frontage and the Hornhill Farm track boundary; these changes have allowed the retention of the majority of the existing trees.

Despite the changes to the Cumbernauld Road frontage, the units still extend close to Cumbernauld Road, projecting forward from the existing south gable of the Garfield Hotel and considerably further forward than the main existing building line formed by the main frontage of the Garfield Hotel and the existing nearest residential properties on Mount Harriet Drive. Except for the area where the trees are being retained, 50% of the open space running parallel with Cumbernauld Road is similar to the refused proposal, remains narrow, and the houses on the frontage will have a significant visual impact on Cumbernauld Road.

Along the other boundaries the proposal is similar to the refused layout. As a result, the visual impact of the development remains unacceptable, and, very obviously, not considerably reduced from the previous proposal. To achieve a significant reduction on the visual impact, the number of units would have to be reduced, and the building line moved further north. The proposed site plan, produced by the Community Council, indicates an alternative proposal which moves the building line further north along the south and south eastern boundaries, which would significantly reduce the visual impact of the development.

(Appendix 1)

Furthermore accommodating 199 units on this site produces a dense site layout which is clearly evident at the site boundaries. This significantly changes the character of the site from an attractive open farmland landscape to an unattractive urban character. Mitigating the change in character of the landscape and reducing the visual impact would be achieved by setting the housing units further back from the boundaries. In addition, two drawings are included which reinforce these issues. (Appendices 2 and 3)

Screening

Within paragraph 1.39 of Annex 2 of the LVIA, the note indicates; *'screening a proposal is not always the best or the most appropriate option.'* However, the Landscape Strategy drawing 99-54-10b, notes that planting is introduced on the south east boundary *'to provide enclosure and screening to the existing roundabout'*. Furthermore, paragraph 5.15, Landscape, of the LVIA, Annex 2, also notes that the landscaping will *'screen views of the proposed built form from the wider landscape'*. Paragraph 8.6 identifies that the *'structure planting provides mitigation in screening views of the built form'*.

Following refusal of the appeal on the previous application and comments in the decision notice by DPEA Reporter Cook, the developer is proposing to reduce the visual impact by introducing screen planting. As noted within paragraph 1.39, this indicates that there is an inappropriate balance between the built development and open space. A reduction in the number of units within the development would maintain a higher quality development with a more appropriate density in keeping with the landscape setting and reduce the visual impact without the requirement for screen planting.

Viewpoints

Within the LVIA report paragraph 8.9, the developer notes that *'the viewpoints demonstrate the lack of visibility of the site from the surrounding landscape. The minimal visibility will be further reduced by the screening effects of the proposed structure planting when it establishes.'* Paragraph 8.12 continues, *'the LVIA has identified that there will be no significant impacts on the landscape and visual receptors as a result of the proposal.'*

These statements are clearly misleading. The photomontage views have been carefully chosen not to show the full visual impact of the development. For example, within Viewpoint 6, 30% of the site is obscured by existing planting which is located on the south of Cumbernauld Road and outwith the site. The same applies to other viewpoints, particularly those which are closer to the site: Viewpoints 4, 5, 7A and 7B. Viewpoint 8 shows clearly the significant adverse visual impact the development has on the existing landscape. The viewpoints indicate that, in its current form, this proposal will have a significant adverse visual impact on the character of the site, the open aspect of the landscape setting, and the wider area. Furthermore, mitigation by screen planting is not an acceptable solution for compliance with the principles of DSP4.

Boundaries, Acoustic Fences.

The Acoustic Fence Drawing, 8691 P011 Rev A, indicates timber acoustic fencing at three heights - 1.8m, 2.6m and 3.2m high. The drawing refers to an Acoustic Bund Specialist drawing which does not appear to have been submitted. It is also unclear from the proposed site plan where these fences will be located. However, it is likely that these will be required to the rear gardens of the units backing onto the A806 alongside the east boundary. A 2.6m and 3.2m high acoustic fence will be a significant visual intrusion and could be precluded if the housing units were set back further from the road.

Landform

To comply with current Technical Standards for barrier free access, low gradient footpath access is required to the principal entrance to properties and the soft landscaped areas of gardens should generally not slope steeper than 1:10. To achieve these requirements, housing now requires to be designed on relatively level platforms, and if layouts are designed to a high density on sloping sites, this will require the creation of large platforms created by means of cut and fill.

On this site the topography slopes down to the south and north from a ridge running parallel with Cumbernauld Road on the line of the farmhouse. The topography also slopes down to the east boundary. Because the density of this development is high at 199 units, platforms will have to be created throughout the site. With reference to drawing 8691 P062 Rev F, Site layout Showing Cut and Fill, raised platforms are created on the north and south slopes, and the ridge is reduced in height. Significant raised platforms, as high as 3.0m, are proposed to the housing in the south east corner opposite the roundabout, and a 2.5m high platform to form the housing in the middle of the site on Cumbernauld Rd. The aforementioned raised platforms will significantly raise the prominence of these houses and increase the visual impact. Further raised platforms up to 2.5m are proposed on the south slope. The changes in level are also shown on site section drawing Section A-A and B-B, within the Design and Access Statement; the deliberately small scale of these drawings provides a misleading impression of minimal cut and fill when the reality of the scale of proposed landform redesign is significant.

A review of the drawing in detail shows the full extent of the cut and fill. Only a very small percentage of the site, around 10% or less, is being retained at the existing contours, and the cut and fill depth is not insignificant. (Appendix 4)

Within the Planning Statement in paragraph 3.3.1, the developer notes that the current proposal would *'substantially reduce regrading of the site. The proposed site levels are tied to existing levels to follow the general grain of the landform.'* Again, this statement is misleading, and with reference to the Cut and Fill drawing, it is clear that significant regrading of the topography is required to create platforms to accommodate the development. Embankments or retaining walls will be required at the base of these slopes to grade the raised levels into the existing topography. If the density of the development was reduced, significant regrading of the landform would not be required and the degree of cut and fill would be reduced.

Paragraph 38 of the Notice of Intention decision for PPA-320-2118, refers to *'landform, the intention to restore and reinforce existing landscape features...'*; maintaining the existing landform has been identified by the original Reporter and by Reporter Elspeth Cook in her refusal of the previous application as noted in paragraph 13 of her Appeal Decision Notice - *'I find the change in the landform to be significant and certainly exceeds the description of slight re-grading'*.

LVA paragraph 6.4 notes, *'the proposal will not greatly alter the landform'*. On the contrary, considering the detailed levels, the proposed change in landform is significant, and not compliant with the requirement to minimise the change in the existing landscape and landform. The proposal will also have a consequential change in the character of the landscape, which is not compliant with DSP4.

Revised Design

The Planning Statement notes in paragraph 3.2, that *'the applicant has significantly altered the proposals contained in the first AMSC application to fully address the concerns raised by the appeal Reporter.'*

Following a detailed analysis of the proposals, it is clear that the proposals have not been significantly altered to address the issues raised by Reporter Elspeth Cook when refusing the previous application on appeal, and consequently this application fails once again to achieve a high standard of design as required by North Lanarkshire Council Policy DSP4.

SuDS

Within paragraph 3e of the applicants' Planning Statement it notes that *'a Drainage Strategy has been submitted with this application, as well as plans, detailing the proposals for foul and surface water drainage.'* In addition, proposed presentation layout 1200303 illustrates the adoption of two attenuation basins viz SuDS01 and SuDS02.

SuDS01: This attenuation basin is situated at the south-western corner of the site, immediately adjacent to the Cumbernauld Road and facing the main entrance to the development. As a result, it will be highly visible to the public from many viewpoints, give rise to safety concerns and impact negatively on the environment. The artificial design of attenuation basins is not aesthetically pleasing, and this particular basin will generate an unacceptable feature at this prominent location. SuDS01 will not *'create an attractive natural space'* as described by the applicants. The adoption of SuDS01 does not comply with DSP 4 (3e) and the applicants require to resolve this issue.

SuDS02: This is the main treatment basin for the site which lies to the north east of the site and links to proposed footpaths. The drainage strategy compiled by Charles Scott & Partners for the applicants notes at paragraph 3.2.4 that, *'It is proposed that during the redevelopment of the site for residential use that the site will discharge the surface water to two locations. The north section of the site is to discharge to the Garnkirk Burn that flows along the northern boundary. The smaller southern section of the site is to discharge into the Scottish Water sewer or the small drain close to the A80 Cumbernauld Road. Both the north and the south sections will discharge to the SUDS features prior to their proposed outfalls.'*

A SuDS scheme should minimise the environmental impact of the development in line with DSP 4 (3e) and it is of great concern that this strategy proposes to discharge to the Garnkirk Burn which sits within and supports the SiNC. Increased outfalls from a large-scale housing site have the potential to flood and consequently erode the SiNC and, in turn, damage the flora and fauna and wildlife species using the burn as their habitat. The adoption of SuDS02 does not comply with DSP 4 (3e) and the applicants require to resolve this issue.

S&DCC believes that underground attenuation tanks fitted with integral hydro-brakes represent a significantly better, safer and lower maintenance option at this site, regardless of any additional cost.

In summary:

1. The density of the development is too high to achieve a design which does not adversely affect the character of the area and the landscape.
2. Significant alterations are required to the landform to accommodate 199 units within the site.
3. The proposals in this application are not materially different to the previous proposals that were refused by North Lanarkshire Council and dismissed at appeal

S&DCC therefore requests that North Lanarkshire Council refuses this application on the grounds that the proposal fails to meet the criteria for a high-quality development.

Regards
Alice Morton
Chair S&DCC



S&DCC. ALTERNATIVE SITE PLAN.

