

**Statement of Publicity and Consultation and
Report on Matters kept under Review (Survey)**

Introduction

1. The Structure Plan Alteration 2006 should be accompanied by two reports relating to the consultation processes on the Alteration and the survey and analysis that the Joint Committee has used as background to the Alteration.
2. Formal advertisements to announce the start of the consultation were placed in *The Herald* and *Edinburgh Gazette*. Further adverts were also placed in a range of local newspapers.
3. Publication of the Draft Finalised Alteration 2005 on 21st October 2005 gave six weeks for responses to be made (compared with four weeks minimum requirement under regulations). This deadline was extended to any party which requested it. To date, 138 Responses have been received; this includes the Bishopton Residents' 1,632 Standard Responses plus 587 Standard Responses with additional comments (Appendix 1). A CD has been sent to all members comprising the total responses.
4. It is a statutory requirement that a Statement of Publicity and Consultation be submitted to the Scottish Ministers with the submission for Approval of any Structure Plan or Structure Plan Alteration, setting out how the Strategic Development Plan Authority approached publicity and consultation and engaged all stakeholders in preparing and finalising the Plan Alteration.
5. Attached is a draft of the Statement in respect of the Glasgow & Clyde Valley Joint Structure Plan Alteration 2006. This Statement is based on the style used in the submission of the Approved 2000 Structure Plan.
6. The Joint Committee has used a wealth of monitoring and analytical data in reaching its decisions on the Plan, which will comprise the survey of matters to be kept under Review, the required *Report of Survey*.

Recommendation

7. It is recommended that the Joint Committee agrees the Statement of Publicity and Consultation on the 2006 Alteration.
8. It is recommended that the Joint Committee authorises the Structure Plan Manager to finalise the details of this report and prepare a report documenting the survey that has been used in the preparation of the Alteration.

**Vincent Goodstadt
Structure Plan Manager**

GLASGOW & THE CLYDE VALLEY JOINT STRUCTURE PLAN ALTERATION 2006

STATEMENT OF PUBLICITY AND CONSULTATION

January 2006

**GLASGOW & THE CLYDE VALLEY JOINT STRUCTURE PLAN ALTERATION 2006
STATEMENT OF PUBLICITY AND CONSULTATION**

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1.0 INTRODUCTION

- 1.1 This publication sets out the processes of participation and consultation by which the Glasgow & Clyde Valley Structure Plan Joint Committee (GCVJSPC), on behalf of its eight constituent Local Authorities, has arrived at the submission, to the Scottish Ministers, of its third and most significant Alteration to its long-term Development Planning Strategy for metropolitan West-Central Scotland, the MDS (Metropolitan Development Strategy).
- 1.2 Prepared under the statutory provisions of Scottish Planning legislation, and accompanying advice, the submitted Alteration is the culmination of a wide-ranging and inclusive process of partnership working, participation and consultation with a wide diversity of agencies, organisations, companies and individuals in metropolitan West-Central Scotland and outwith. This process commenced with the Structure Plan Joint Committee's publication in December 2004 of its Discussion Document '*The Future for Glasgow and the Clyde Valley 2025*' as a prelude to a major Alteration to its existing Structure Plan, which itself was approved by the Scottish Ministers in May 2002. Additionally, in their original Decision Letter on the 2000 Plan, the Scottish Ministers placed a responsibility upon the Joint Committee to undertake further work on specific Policy areas of the MDS. This work was incorporated into the current 2006 Plan Alteration with the agreement of the Scottish Executive.
- 1.3 The Joint Committee also recognises that its strategic planning responsibilities are but one part of a wider 'Public Policy Arena' within which partners and key stakeholders have responsibilities to develop a range of strategies and policies to address their individual organisational remits. The Joint Committee therefore has sought to integrate its own work with this wider range of Strategies and has fostered, commissioned and participated in, integrated working with partners so that the Structure Plan fully complements their work.
- 1.4 The Joint Committee would wish to express its gratitude to all who have participated in this process, and to all consultees who have given time to make comment upon and input to the Alteration during the various stages of its development. The Joint Committee has fully considered all inputs at a number of its Seminar and Committee sessions, and has sought to incorporate all such views within the Plan where feasible and consistent with the aims of its approved Planning Strategy.
- 1.5 Copies of the final submitted Alteration - '*The Glasgow & Clyde Valley Joint Structure Plan Alteration 2006*' – will be available from a range of sources - the Planning Offices of the eight constituent Authorities, the office of the Joint Committee, public libraries, or by accessing the Joint Committee's Web-site.

www.gcvcore.gov.uk

2.0 THE GLASGOW & CLYDE VALLEY STRUCTURE PLAN JOINT COMMITTEE

2.1 The preparation and submission of a Structure Plan and associated Alterations are statutory requirements upon Planning Authorities under the terms of the **Town & Country Planning (Scotland) Act 1997**. In a number of cases, under the **Designation of Structure Plan Areas (Scotland) Order 1995**, there is a requirement upon such Authorities jointly to prepare a Structure Plan for a larger area than that of a single Authority. Such a situation applies in the Glasgow & Clyde Valley area, where the Designation Order seeks that the following Authorities (in alphabetical order) work jointly in the preparation of this Plan:-

| | |
|----------------------------|----------------------------|
| East Dunbartonshire | East Renfrewshire |
| Glasgow City | Inverclyde |
| North Lanarkshire | Renfrewshire |
| South Lanarkshire | West Dunbartonshire |

2.2 In order to fulfil these statutory requirements, the Authorities instigated a **Joint Structure Plan Committee**, under a formal **Minute of Agreement**, comprising two political members of each Authority, and its own small Professional Planning Team, known as the Core Team. The Joint Committee is advised by a Steering Group of the Authorities' Planning Directorates and the Joint Committee's own Planning Managers.

2.3 These provisions were agreed and instigated by the eight Authorities in late 1995 and early 1996, immediately prior to Local Government Re-Organisation in April 1996.

2.4 The Joint Committee's responsibilities cover the following:-

'The preparation, monitoring and review of the Structure Plan on behalf of the member Councils'

'Advice and recommendations on the policy content of the Structure Plan, including the approval of the plan by member Authorities, its submission to the Secretary of State for Scotland (now the First Minister of the Scottish Executive) and its final approval'

'The receipt of reports on the conformity of Local Plans within the Structure Plan and on development control matters of strategic importance'

'Liaison with and representation to Central Government, Scottish Enterprise, Local Enterprise Companies and other bodies as necessary on matters of relevance to Structure Planning in the Glasgow and Clyde Valley Structure Plan area'

'Responses to and comment upon Structure Plans, planning applications and other development proposals submitted to the Joint Committee by adjoining Authorities'

'Such other action as may be necessary from time to time to sustain the policies contained in the Structure Plan and contribute to the economic, social and environmental regeneration of Glasgow and Clyde Valley'.

2.5 Acting on behalf of the eight member Authorities, secretariat and support services to the Structure Plan Joint Committee are provided by Renfrewshire Council.

3.0 PARTICIPATION, CONSULTATION AND PUBLICITY – STATUTORY BASIS

- 3.1 This Report stems from the provisions of the Town & Country Planning (Scotland) Act 1997, Part II, Section 8 (6), which places an obligation upon Planning Authorities, when submitting a Structure Plan to the Secretary of State (now Scottish Executive) for approval, that it be accompanied by a Statement containing relevant details of how publicity, consultation and representations regarding the contents of the Plan were handled.
- 3.2 In specific terms, the above Act, Part II, Section 8(1) - (3), states that, when preparing and finally determining the contents of a Structure Plan for submission, the Planning Authority(ies) must take steps so as to secure, in their opinion, that -
- adequate publicity is given to the issues and content of the Plan
 - all persons wishing to make representations are aware of their right so to do
 - all such persons are given adequate opportunity to make such representations
 - all such representations, received within the prescribed consultation period, are considered by the Planning Authority(ies)
- 3.3 In terms of the above-mentioned Act and its qualifying Regulations - The Town & Country Planning (Structure and Local Plans)(Scotland) Regulations 1983, there is provision for the prescribed consultation period to be not less than four weeks and is specified by the Authority(ies) when a consultation period is launched.
- 3.4 Other provisions of the above Act and Regulations relevant to the Publicity issue, relate to the actual Publicity surrounding the time of actual submission.
- 3.5 Under the above Act, Part II, Section 8(4) & (5), the Structure Plan Authority(ies) shall make copies of the Plan, as submitted to the Secretary of State (now Scottish Executive), available for inspection at their Office(s) and at other locations as the Authority(ies) considers appropriate in making the Plan widely available to all potential representees. At the same time, each copy of the Plan shall be accompanied by a statement of the time period within which objections to the Plan may be made to the Secretary of State (now Scottish Executive).
- 3.6 Under Regulation 13 of the aforementioned Regulations, the Planning Authority(ies) are required to give notice to all potential consultees and representees, by advertisement, of the submission.

4.0 PARTICIPATION, CONSULTATION AND PUBLICITY – THE GCVJSPC APPROACH

- 4.1 The Joint Committee and its constituent Authorities, from the date of local government re-organisation in April 1996, articulated a philosophy of transparency and inclusion regarding the achievement of its forward Planning remit.
- 4.2 This philosophy was translated into a set of processes which went beyond that demanded by the requirements of the aforementioned Act and Regulations, and sought a wider interpretation of **CONSULTATION**, seeking greater levels of actual **INVOLVEMENT** and **PARTICIPATION** of the diverse range of 'stakeholder' Government Agencies, Business interests, Development sector interests, Academic Institutions, Adjoining Local Authorities, Non-Governmental Organisations, Public Groups, etc. in the actual technical work leading to the adoption of the Plan. This approach was to stand in contrast to the more traditional, formal and restricted interpretation of **CONSULTATION** on a Plan, at the point of publication and/or finalisation. The Joint Committee and its constituent Authorities remain committed to deepening and developing this process as it continues to evolve its Strategic Development Planning role.
- 4.3 Effectively, this approach consistently has sought to bring the maximum number of relevant partners and potential stakeholders into the Strategic Planning process, through shared activity in:
- (a) formulating the long-term Vision, which would frame the Planning Strategy, as well as its aims and objectives, its targets, its issues and its priorities for implementation;
 - (b) testing the underlying assumptions of the future Plan, its emerging strategic issues and its Strategy and Policy content; and
 - (c) testing the detailing Policy outcomes
- 4.4 Central to the formulation of the Approved Plan 2000 was the Joint Committee's '**Plan-making Network**', operating in both formal and informal modes. Additionally, this 'network' had both '**External**' and an '**Internal**' elements; the former to incorporate the range of Governmental Agencies, Utilities, Infrastructure and Educational Institutions, Industry and Business, Community and Voluntary Groups, and the Development Sector; the latter to ensure incorporation of all constituent Authorities, Adjoining Authorities, and the technical arms of Governmental Agencies, where relevant. A detailed description of the '**Network**' is set out in the 'Statement of Publicity and Consultation' to the 2000 Plan. As the overall MDS gained maturity and its delivery gained momentum since its Approval by the Ministers, the '**Network**' itself has evolved and taken on new shapes, but its constituent members have remained highly influential in formulating the 2006 Alteration. Participation of 'Network' member organisations has been both direct in terms of helping to refine the shape of the MDS as set out in the 2006 Alteration, but also indirectly through a number of avenues of joint working that has helped to underpin the MDS. The key elements of this joint contextual working are set out in the following section.

Long-term Vision and Strategy Scenarios – Integrated Partnership Working

- 4.5 During the development of the Approved 2000 Plan, the Joint Committee's 'Strategic Futures Group' was a key element in the Plan-making 'Network', and was instrumental in developing the strategic planning scenarios which set the context for

the MDS and its Policy package. This type of work is being revisited, but in a wider 'corporate' context which links the Structure Plan with the wider Public Policy arena and its constituent strategies and policies. **The Clyde Valley Community Planning Partnership (CVCPP)** provides the relevant wider 'Public Policy' umbrella within which the Structure Plan is a key development component. Consequently, the scenario work is being addressed through a working team of the **Enterprise Network**, led by **Scottish Enterprise Glasgow (SEG)**, the **Joint Committee, constituent Authorities, Glasgow University, Strathclyde European Partnership**, and a **specialist Consultancy**, with the **CVCPP** as the key 'corporate' client. One of the core objectives is to provide a common long-term vision as the operating context for all 'Public Policy' strategies in the Glasgow & Clyde Valley area, including the Structure Plan. **Appendix I (to be added)** sets out the membership of the Scenarios Group and its work to date.

Economic Forecasting & Analysis – Integrated Partnership Working

- 4.6 The Joint Committee is conscious that its long-term strategic planning for growth, as set out in the 2006 Alteration, is based upon more optimistic demographic forecasts than those of the General Register Office for Scotland (GROS). These differences emerge from forecasting methodological and information differences, as well as a more aspirational attitude to achieving the growth necessary to foster Scotland's long-term economic growth. In order to test the credibility of its forecasts, the **Joint Committee**, in partnership with **Scottish Enterprise**, commissioned specialist economic forecasts from a private Consultancy, linked to the Treasury's own forecasting Consultants. This **joint working** with the National Economic Development Agency and the private sector, utilising modelling methodologies which nest with the International, UK and Scottish economies and which therefore reflect the metropolitan area's economic contribution to these economies, gave a clear indication that the Joint Committee's 2006 Alteration had solid economic foundations.

Transportation Strategy – Integrated Partnership Working

- 4.7 The Joint Committee recognises that Transport Strategy and Policy is central to the delivery of the MDS and requires to be closely integrated with land-use strategy and policy. The **Joint Committee** is conscious of the changes being put in place by the Scottish Ministers to enhance the focus on delivering transport investment priorities and coordinating transport policy across Scotland. It therefore worked with its key transport partners, **Strathclyde Passenger Transport**, and the **local Transport Authorities**, to develop an integrated approach to transport and land-use planning, culminating in the publication in 2005 of the Joint Transport Strategy for Western Scotland, which in turn will provide the basis of the Regional Transport Strategy under the new Transport Agency for Scotland and its Regional Delivery Partnership arms. The Approved 2000 Structure Plan, the 2006 Alteration and the Joint Transport Strategy 2005 all share the same overarching strategic transport priorities, designed to support a close integration of land-use and transport.

5 THE STRUCTURE PLAN ALTERATION 2006

Stages in the Preparation of the 2006 Alteration

- 5.1 As introduced in paragraph 1.2, the current 2006 Alteration is the culmination of a number of specific Plan-making stages

Stage 1 – The Scottish Ministers stipulation, in their Decision Letter of 26 April 2002, of further work in the areas of Retail Policy – specifically – “The Joint Committee will hold discussions with the retailing industry on the assessment of retail requirements in the period beyond 2006 with a view to bringing forward a longer-term strategy for town centres and retailing as an Alteration to the Structure Plan before the end of 2003”

and in the area of Housing Land supply – specifically –

“.....(The) Joint Committee will undertake further discussions with Homes for Scotland, Communities Scotland and other interested parties on the potential output from the Established Land Supply and other sources in the period 2006 to 2011 and beyond”

“.... (The) Joint Committee will monitor the Plan and every two years, assess the need to review housing land requirements. The assessment will have regard to changes in the supply and demand for housing land, including the implementation of Schedule 6(b)(ii), and changes in the national and Structure Plan areas economies.”
“Following the assessment, the Joint Committee will take any required action, including, if necessary, the release of additional land through a Review or Alteration of the Structure Plan.”

The Ministers also endorsed, through their Decision Letter, the Joint Committee’s stated priority to produce an integrated policy approach to environmental issues as a priority for the first revisions of the 2000 Plan.

Stage 2 – the publication by the Joint Committee in January 2002 of a consultative paper – ‘*A Framework for the Sustainable Development of Natural Resources*’; in September 2003 of an Issues Report – ‘*Longer-term Strategy for Town Centres and Retailing*’ and an Issues Report – ‘*Wind Energy in the Structure Plan Area*’.

Stage 3 – The publication by the Joint Committee in December 2004 of its Discussion Document – ‘*The Future for the Glasgow and the Clyde Valley 2025*’

Stage 4 – The publication by the Joint Committee in May 2005 of its Consultative Draft document of the Structure Plan Alteration

Stage 5 – Extended consultation by the Joint Committee in October 2005 on the Draft Finalised Alteration document.

- 5.2 Whilst the Scottish Ministers set a tight deadline in terms of their request for an Alteration addressing Retailing and a Town Centre Strategy, the actual mechanics of liaison and developing the participation of the retail industry proved more complex than they might have anticipated. The Joint Committee, in its liaison with the Scottish Executive over this Ministerial requirement, was given clearance by the Executive in a letter of March 18, 2004 that it would be in the spirit and intent of the Ministerial demand, to incorporate the required Alteration into an overall Structure

Plan Alteration. Accordingly, along with the other aspects set out in the Stages above, it has been incorporated into the 2006 Alteration.

Additional Demands of the 2006 Alteration

- 5.3 Two new aspects of the strategic development planning process have demanded additional consultation and participation processes of the Joint Committee. The new legislation on Strategic Environmental Assessments (SEA) has come into force and the Joint Committee has had to respond to this, particularly in terms of its consultation with the SEA Consultation Authorities – Scottish Natural Heritage (SNH), Scottish Environmental Protection Agency (SEPA) and Historic Scotland. Additionally, the forthcoming New Planning Bill, currently entering its parliamentary stages, places great stress on the implementation of Development Plans, and the Joint Committee has decided to act early on this issue and has undertaken significant consultation with key stakeholders and partners with a view to developing a range of thematic action programmes to complement the 2005 Alteration. The key thematic Action Programmes developed to support the 2006 Alteration include the following:

Economic Development Programme – with Scottish Enterprise and its Network
Deep Infrastructure Programme – with Scottish Water
Health Programme – with Glasgow Centre for Population & Health, Health Scotland, and the three constituent Health Boards
Green Network & Greenspace Programme - with the Forestry Commission and Scottish Natural Heritage
Joint Transport Strategy – with WESTRANS and SPT

In addition, discussions are in hand with SEPA on the preparation of a joint action programme during 2006.

- 5.4 The Joint Committee has held over fifty working sessions, both technical and policy with its key delivery partners in the development of these Programmes to support the 'Action' aspects of the 2006 Plan; the details of these sessions are set out in **Appendix II (to be completed)**.
- 5.5 The Joint Committee also has recognised the need, in particular, to ensure consistency of Planning Policy approach with Planning Authorities across Scotland, as its demographic and economic forecasts are predicated on the other City-Region Authorities of Scotland making their contribution to enhance the overall economic performance of Scotland. A process of on-going consultation has been agreed, with some six seminars during 2004 and 2005 (**Appendix III to be added**) The Joint Committee has also been mindful of the need to ensure consistency of Strategy and Policy with adjoining Authorities and consultation meetings and correspondence have been undertaken.

6.0 PARTICIPATION and CONSULTATION AND PUBLICITY – DETAILED ACTIONS OF THE JOINT COMMITTEE

6.1 In order to engage all relevant stakeholders in the development of the 2006 Alteration, the Joint Committee has adopted a range of techniques with the objectives of:

- (a) widening the net of participation in the Plan
- (b) increasing the overall levels of publicity related to the Plan
- (c) targeting involvement and publicity at selected pertinent stakeholders

Consultative and Focus Groups

6.2 Given the stipulations of the Scottish Ministers in terms of the retail and environmental policy sectors, the Joint Committee established Consultative Fora from which **two specific Focus Groups** were drawn at the request of the **Retail and Wind Energy Industries**. These groups became the primary discussion and advisory centres for the Joint Committee in meeting the specific demands and endorsements of the Scottish Ministers in these policy areas. The membership of these Groups and the dates of working sessions with them are set out in **Appendix IV (to be added)**.

Specialised Meetings

6.3 The Joint Committee conducted a series of specialised meetings during the process of preparing the 2006 Alteration. Essentially, these comprised meetings with individual partners, consultees, consultants, companies, umbrella organisations and interested parties. The general focus was on technical working and issue exploration related to the Plan and has been an essential component of widening stakeholder knowledge of the Plan, of agreeing common understandings, and of building partnership around the Joint Committee's long-term Vision and Strategy. The range and timing of these meetings with relevant stakeholders are set out in **Appendix V (to be added)**.

Consultation Periods

6.4 Under the provisions of the Town & Country Planning (Structure and Local Plans) (Scotland) Regulations 1983, a Local Authority(ies) must allow for a minimum of four weeks in terms of the period that it (they) prescribes when giving publicity to Structure Plan preparation and submissions.

6.5 Consultation, following the publication of the various Discussion Papers, Issues Report and Consultative Draft Plans between 2003 and 2005, adopted periods significantly greater than the minimum required under the Regulations, whilst exercising flexibility and remaining open to additional representation until such time as the Joint Committee had agreed and finalised its view of representations and points arising from that process.

6.6 In terms of the various stages outlined in Section 5, the Joint Committee adopted a mixed approach to consultation, on the one hand targeted at key stakeholders and interest groups, and on the other, wider more general consultation. In the case of both the Issues Reports on Retail and Wind Energy, and the Discussion Document, these were essentially targeted at specific consultees and not subject to advertisement, whilst the Consultative Draft and Draft Finalised Alteration stages were more formal in consultation terms and were advertised to a more general

audience. **Appendix VI (to be added)** itemises the details of each Stage, with all consultees listed for that period of consultation, where relevant. In all cases, consultation was six weeks or more. In each case, however, periods were effectively, whilst not formally, extended and additional time was made available to those Consultees who requested more time within which to make further representation.

- 6.7 Whilst these periods reflect the specific requirements of the Planning Act and its supporting Regulations, the process of consultation and dialogue on Plan content, continued through informal working meetings and sessions to address specific concerns of consultees before the formalisation of their views and comments.

Advertisements and Press Releases

- 6.8 Under the terms of the Act and Structure Plan Regulations, there is a specific requirement to advertise formal publication stages in the Plan preparation process. These requirements have been met in full, both by the Joint Committee, at the strategic level, and by the individual Local Authorities, at the local level. The formal notices were published in the Edinburgh Gazette and Herald Newspaper, with copy adverts also being included in local publications. The details of the relevant newspapers utilised for these formal advertisements, are set out in **Appendix VII**.
- 6.9 Simultaneously with these advertisements, press releases were issued.

Distribution of Copies

- 6.10 The Issues Reports, Discussion Document, Consultative Draft and the Draft Finalised Alteration were sent out to all parties listed on **Appendix VI (to be added)**. Additionally, copies of Technical Working Papers, **(Appendix VIII – to be added)** which provide additional detailed technical information on methodologies and data used, as well as details of Demand-Supply analyses, were made available upon request. All documents were available for inspection at Local Council Offices.

Public Meetings

- 6.11 The Joint Committee organised public consultations which were of a general nature, whilst the more local demands were to be met by the individual Authorities, with back-up from the Joint Committee as required.
- 6.12 The majority of Authorities focused their efforts through Community Council meetings, although some Authorities chose additionally to conduct Councillor and Official level presentations and seminars; others to facilitate 'Public Panels' day events; others to an expanded local consultation effort. **Appendix IX (to be added)** outlines the methods adopted at the local level.

Web-site and E-mail Representations

- 6.13 As part of the Publicity and Consultation effort surrounding the Consultative Draft Plan publications in 2005, the Joint Committee utilised its Web-site 'www.gcvcore.gov.uk' to widen dissemination of its proposed changes to the Approved 2000 Plan. The site provides both details on the work of the Joint Committee, and allows for the Issues Reports, the Discussion Document, Consultative Draft Plan and the Draft Finalised Alteration stages to be accessed on-line in an indexed format for easy access to their component chapters. 'Hot-links' to relevant Partners' Web-sites are also incorporated on the site in order to reinforce

the 'joined-up' inclusive thinking which underlies the Joint Committee's approach. Part of the Web-site provided for on-line consultation responses through mailed forms or direct e-mail to the Joint Committee.

- 6.14 The Web-site is central to the Joint Committee's future vision of allowing on-line access to its Strategic Planning work and it is intended that past Plans e.g. The Strathclyde Structure Plan 1995, Joint Committee Papers, and future publications, including the submitted 2006 Plan will be made available on a revised Web-site in 2006.

7.0 THE 2006 ALTERATION FORMAL CONSULTATION TIMETABLE:- MILESTONES

| Milestone Event | Date |
|---|-------------------|
| Publication of 'A Framework for the Sustainable Development of Natural Resources' – The Joint Committee | Jan. 2002 |
| Approval of the Scottish Ministers to the Glasgow & The Clyde Valley Joint Structure Plan 2000 | May 2002 |
| Notice of Intention to Start Preparation of Alterations to the 2000 Approved Joint Structure Plan | Nov. 2002 |
| Publication of 'A Longer-term Strategy for Town Centres And Retailing' – An Issues Report – The Joint Committee | Sept. 2003 |
| Publication of 'Wind Energy in the Structure Plan Area' An Issues Report – The Joint Committee | Sept. 2003 |
| Joint Committee consideration of Consultation Responses to Issues Reports | Nov. 2003 |
| Publication of 'The Future for Glasgow and the Clyde Valley 2025' – A Discussion Document - The Joint Committee | Dec. 2004 |
| Joint Committee consideration of Consultation Responses to the Discussion Document | Mar. 2005 |
| Publication of The Consultative Draft Alteration 2005 – The Joint Committee | May 2005 |
| Joint Committee consideration of Consultation Responses to the The Consultative Draft Alteration | Aug. 2005 |
| Publication of the Draft Finalised Alteration 2005 - The Joint Committee | Oct. 2005 |
| Joint Committee consideration of Draft Finalised Alteration 2005 Responses – the Joint Committee | Dec. 2005 |
| Joint Committee consideration of Draft Finalised Alteration Responses and Finalised Structure Plan Alteration 2006 | Jan. 2006 |

8.0 CONSULTATION OUTCOMES – ANALYSIS OF REPRESENTATIONS

COMMENTARY ON KEY ISSUES RAISED

- 8.1 The following section systematically addresses the issues raised by consultees during the consultative stages of the 2006 Alteration. For each issue, the Joint Committee's response is set out.

THE STRUCTURE PLAN TARGETS

Issue: Although supported overall, SPT has questioned the basis of the two targets to promote the integration of land use and transportation – (a) to sustain or increase the level of public transport use; and (b) to double the proportion of households with access to dedicated/prioritised public transport routes.

Response: Target (a) is already established in the 2000 Plan and is consistent with the 'SPTS 2 2000' first objective for promoting a modal shift to increase public transport journeys. Target (b) is the expression of the potential consequence of the mass transit proposals of the Plan which relate to an area (diagram 7 of Consultative Draft) with double the number of households that are currently accessible to dedicated routes public transport. The text of the written statement has however been adjusted to make it clear that these are the views of the Joint Committee who will work with the new strategic transport partnership to progress them.

GUIDING PRINCIPLES OF SUSTAINABLE DEVELOPMENT

Issue: Habitats Directive Judgement: The Scottish Executive has drawn attention to the European Court ruling on the transposition of the Habitats Directive into UK legislation. This may have implications for government policy, and it is important for the Plan to ensure that it has regard to the directive.

Response: Article 6(3) of the Habitats Directive makes the requirement for an appropriate assessment of the implications of a plan or project conditional on there being a probability or a risk that it will have a significant effect on the site concerned. This requirement is explicitly built into the 2000 Plan, its Guiding Principles of Sustainable Development, and in particular Strategic Policies 7 and 9. Further legal advice will be sought prior to the submission of the Plan on the precise wording of the Plan.

STRATEGIC POLICY 1: STRATEGIC DEVELOPMENT LOCATIONS

General Overview: The proposed changes to this policy have been supported in respect of the renewal priorities (Schedule 1(a)), green network (Schedule 1(f)) and the additional Schedule of transport priorities. The main issues raised related to the Community Growth Areas (Schedule 1(c)). Comments were also raised on the Rural Investment Areas These issues are considered below.

Schedule 1(c) Community Growth Areas

The areas of urban expansion into the Green Belt to facilitate large-scale housing development, identified as Community Growth Areas, raise a range of potential objections by various house-building and other interests. These relate to the following issues:

- Issue 1: The identification of particular locations as Community Growth Areas
- Issue 2: Master Planning
- Issue 3: Form and Phasing of Release

Issue 4: Monitoring and Control of Development
Issue 5: Areas not identified for urban expansion
Issue 6: Bishopton Community Growth Area
Issue 7: Relationship to the Green Network

Issue 1: The identification of particular locations as Community Growth Areas:

Individual housebuilders and community organisations have objected to the designation of Bishopton as a Community Growth Area. The identification of East Kilbride as a Community Growth Area has also raised concerns for Eaglesham Community Council. SNH has clarified its position to avoid any misinterpretation, in that it does not seek to raise general objections to all the Community Growth Areas. It has raised, however, specific concerns about the proposed locations in Glasgow and South Lanarkshire on which it indicates that it may wish to raise an objection. For some of the other locations it identifies a range of factors that will need to be taken into account in the preparation of the master plans for these areas (e.g. to protect species and landscape character).

Response: The issues raised by Bishopton interest groups are considered separately in Issue 6. The issues raised by Eaglesham CC relate to the impact of development on the Eaglesham Conservation Area. This is a matter that the Structure Plan requires to be taken into account in the master planning of development and is more appropriately dealt with in the Local Plan. From further liaison with SNH it is understood that its potential objections only relate to the maximum capacities for the search areas identified in the SLC local plan issues report or GCC planning study areas. The capacities used in the Structure Plan however are significantly less for environmental reasons and this has been reflected in the Urban Expansion Technical Report. There will however still be a requirement from local planning to demonstrate that the matters raised by SNH have been taken into account and are built into the master plan. It is therefore considered that the concerns of SNH have already been addressed by the Joint Committee. The other matters raised concerning other locations are noted and have been taken into account in the Urban Expansion Technical Report and through the master planning process.

Issue 2: Master Planning: SNH is concerned about the need for comprehensiveness and effectiveness in master planning to be able to control those matters which cannot be dealt with in the Structure Plan and are matters for interpretation at a local plan level.

Response: Paragraph 2.13 of the Finalised Supplementary Written Statement of the Structure Plan Alteration, seeks to define those matters that will be required of any master plan. From discussions with SNH it is appropriate to add additional criteria about landscape capacity and protection and opportunities for creation and enhancement.

Issue 3: Phasing of Housing Release: Homes for Scotland seek greater flexibility in the phasing of development and allow the earlier development of the Community Growth Areas.

Response: It is necessary to have a clear phasing of housing development to ensure that land is not released prematurely undermining the regeneration process, and to allow the proper planning of infrastructure. The detailed phasing of individual community growth areas is a matter for individual councils to determine within the strategic context set by the Structure Plan.

Issue 4: Monitoring and Control of Uncertainty: SNH seek clarification about how the Joint Committee intends to monitor and control development to avoid blight and

the diversion of investment from renewal areas, and to respond to lower scales of demand if they occur.

Response: There are controls built into the process through the phasing requirements of the Plan (Strategic Policy 1A(ii)). The Joint Committee will monitor the Plan and every two years assess the need to review housing land requirements. This monitoring is also reflected in the Environment Report. Following the assessment the Joint Committee will take any required action through a Review or Alteration of the Structure Plan, if a significantly different demand context prevails.

Issue 5: Areas not identified for urban expansion: Several housebuilding interests have requested that locations which were submitted but not preferred for urban expansion, be reassessed.

Response: The Joint Committee has assessed all 65 locations submitted as potential areas of urban expansion and all locations were given due consideration in accord with the Strategic Assessment criteria outlined in Background Report 7/05 and Technical Report B/05 now updated to Technical report X/06. The majority of the submitted locations were small in scale and did not support the strategic approach outlined in Background Report 7/05 and Technical Reports B/05 and X/06 or were of a medium scale but would have impacted significantly on identified criteria e.g. Langbank, which has been previously recognised as a community sensitive to urban expansion due to their conservation interests. Some of the locations proposed had significant housing capacity but were unpreferred as areas of urban expansion as they were not well served by the transport network and/or raised strategic environmental concerns: North Stepps; Linburn/Southbar, Erskine; Bishopbriggs; in the A8/M8 Corridor; Arkleston; Haughead, Uddingston; and Newton Mearns. The Joint Committee's assessment concludes that the identified Community Growth Areas: Robroyston/Millerston; Easterhouse/Gartloch; Broomhouse/Baillieston/Carmyle; Cumbernauld South; Gartcosh/Glenboig; Newton; Bishopton; Johnstone South; East Kilbride; South Wishaw; Hamilton West; Larkhall/Ferniegair; Carluke, represent the most appropriate locations for the focus of future urban expansion.

Issue 6: Bishopton: In terms of the issues raised the majority of these relate to local planning matters and have been considered by Renfrewshire Council (**see Appendix X**). Most of these matters will be dealt with in detail through the master planning and planning application process both of which will be the subject of further public consultation. From a strategic perspective the key issues relate to the following matters together with a recommended response. These relate to matters already considered in the Committee's earlier report which still apply.

Issue 6A: Risks to Health and Safety including Responsibility for Assessing Contamination

Response: The applications, particularly for the remediation of the site will provide full details of the identified problems of contamination and set out what is required in terms of remediation. Renfrewshire Council have been in regular contact with BAE Systems and the Scottish Environment Protection Agency (SEPA) regarding the site. Any future remediation measures will require to satisfy both parties in terms of;

- any works being carried out in line with current Scottish Executive guidance, and,
- to ensure that the site is remediated in a manner which will not affect the end users of the site or the current residents in the vicinity of the site during the remediation phase of the works.

The Health and Safety Executive will also be part of this regulatory framework.

BAE Systems will require, as part of their remediation plans for the site, to ensure that any treatment/removal of contaminated materials is undertaken in such a manner that it does not cause the escape of contaminants to the wider environment. SEPA will also be a statutory consultee on any applications for the development of the site and will be responsible for licensing activities involving waste disposal.

Given the complex and technical nature of this work Renfrewshire Council will as necessary take its own independent advice on these matters.

Issue 6B: Impact on Natural Environment, Wildlife, Landscape and Green Belt

Response: These issues will be specifically addressed through the Environmental Statements to be submitted with the planning applications. Advice will be provided by Scottish Natural Heritage who are a statutory consultee and through detailed assessment against national planning policy and development plan policy.

Issue 6C: Transport Issues

Response: Transport matters will be covered by the Transportation Assessment and the Public Transport Strategy. The Scottish Executive as Trunk Roads authority as well as the Strathclyde Passenger Transport Executive will be formally consulted. The formation of a new access to the M8 will be assessed in relation to Scottish Transport Appraisal Guidance (STAG).

Issue 6D: Requirement for release of land for housing, scale of development, effect on character of village, and impact on infrastructure and facilities

Response: The need for the release of land to accommodate the long term housing requirements of the Structure Plan Area has been confirmed in the Alteration. Issues relating to the impact of the development of the Royal Ordnance Factory site will be considered in detail in relation to the proposals submitted for the development of the site. The master plan will provide the vehicle for assessing the acceptability of the proposals in relation to the issues raised by the community.

Issue 6E: Lack of Consideration of Alternative Locations

Response: The Joint Committee have undertaken an assessment of potential locations and have considered alternative locations proposed through the consultation process. This work was presented as a Technical Report (refer TR B/05) and was part of the public consultation process.

Issue 6F: Lack of information

Response: The Joint Committee has sought during the consultation process to make available, through a variety of means, all the necessary information to the Bishopton residents. Additionally the Structure Plan Manager has met on various occasions interested parties from Bishopton including the Bishopton Action Group and the Bishopton Liaison Group.

Once the planning applications have been submitted to Renfrewshire Council these will form part of the public register and all submissions from the applicant and consultees will be available for public scrutiny.

Issue 6G: Inclusion of Bishopton Royal Ordnance Factory site as a Community Growth Area before detailed assessment undertaken

Response: The planning system in Scotland is plan led and in accordance with this the Structure Plan seeks to give a strategic planning context for considering detailed issues through the submission of planning applications or through the local plan. The site has previously been identified in the 2000 Structure Plan as an area for the

assessment of long term potential for development and also in the National Planning Framework (2004).

The planning applications which BAE Systems and their development partner propose to submit will allow detailed issues to be assessed in full before a final decision is made. In addition, no formal decision will be taken by Renfrewshire Council on any planning applications for the site until the Scottish Ministers issue their formal decision on the Structure Plan Alteration and it comes into effect.

Issue 6H: Lack of Consultation and lack of regard for representations which have been made

Response: The Structure Plan Joint Committee has undertaken three consultation exercises in respect of the 2005 Alteration. In addition there have been a number of meetings held locally to discuss the redevelopment Royal Ordnance Factory site. The Joint Committee has previously considered a report on representations received in respect of urban expansion areas. Representations made in respect of the Draft Finalised Written Statement will be considered by the Joint Structure Plan Committee at the meeting on 30 January 2006.

Issue 6I: Development Options for Bishopston: Various representations, including the Bishopston Action Group, have suggested that an acceptable proposal for the redevelopment of Bishopston would be to locate the new housing in the Georgetown area of the Bishopston ROF site.

Response: The detailed options for the renewal of the Bishopston site is a matter for the local planning authority in considering the master plan for the site. It should however be noted that the Georgetown area does not relate as well to the criteria set out in the Plan in terms of relationship to the existing community and rail network.

Issue 7: Relationship to Green Network: SNH are concerned that some of the Community Growth Areas are located in the broad areas shown for the development of the Green Network.

Response: The Joint Committee is aware that there is a coincidence between the two policies (Green Network and Community Growth Areas(CGAs)), but it does not consider that there is a conflict. Indeed one aspect of the Green Network is the creation of new areas of Greenspace that accompany CGA's or urban renewal. It is proposed that, in these areas where the Green Network and identified development areas coincide, development through master planning will identify and deliver major Greenspace opportunities as a contribution to the creation of the Green Network. This has been built into the requirements set out in paragraph 2.13. In addition Schedule 1(f) Green Network Priorities has been extended to include several CGAs where strategic Greenspace opportunities exist, and should be promoted.

Rural Investment Areas (RIA) Schedule 1(d)

Issue: Scottish Executive, Greengairs Council and Scottish Coal all refer to the idea of creating Green Jobs and identifying particular areas that can be promoted as Green Opportunity Areas. The Executive state that by altering the RIA references to promote such areas the plan will be more in line with SPP15. Scottish Coal considers that there is particular opportunity for such a designation in the Motherwell villages. Greengairs Community Council has met with representatives from the Executive and is keen to have their area identified as having such an opportunity.

Response: Although there is scope to promote 'green' jobs in these areas it would be misleading to see these areas only in these terms or to imply that the RIA are the primary areas for such activities. However Table 5 in the Plan has been altered to

refer to the promotion of 'green opportunity areas'. This is intended to support the objectives in SPP 15 to promote partnership based initiatives which enhance the environment, diversify the economy and promote access and recreational activity.

Schedule 1(e) Joint Transport Priorities

Issue: The Scottish Executive have raised issues relating to the potential impact of the development proposals in the Plan upon the trunk road network.

Response: The strategic assessment of the aggregate transport impacts of the development proposals in the Plan indicate that compared with the trend scenario (i.e. what would happen if the plan were not to be altered) the proposals would have a beneficial impact, albeit marginal, in terms of journey times, trip length and public transport usage. This is assumed to arise because of the rail oriented locations for new development and does not rely upon any improvement in the management of travel demands. If the Structure plan proposals as a package of land use and transport measures are taken together then there will be a marked improvement relative to the trend scenario if the proposals for enhancing the public transport systems and managing car use are successfully implemented. It is therefore considered that the proposals in the Alteration are sound and that problems of the trunk road network do not arise nor will be exacerbated overall. There may be local issues requiring to be addressed in relation to specific development locations which will have to be addressed through the master planning process. The Alteration makes this clear and the existing Structure Plan Strategic Policies 3 and 9 provide an adequate framework for ensuring that this is undertaken.

STRATEGIC POLICY 2 – A8/M8 CORRIDOR (NEWHOUSE-BARGEDDIE)

Issue: The identification of the A8/M8 corridor as an area requiring assessment of its long term potential for development is supported by various public and private sector bodies. The inclusion of Douglas Support Estate in SP2 is welcomed by the developers. The Scottish Executive also welcomes the proposed study, but confirms the ongoing objection to development at Douglas Support Estate.

Response: The support for the Joint Committee's policy requiring a full assessment of the implications of further development in the A8/M8 corridor is welcomed. It is important that this study is completed before a decision is taken on further development.

STRATEGIC POLICY 4

Issue: The concerns raised about the proposed MSA on the GSO at the time of the 2000 Plan have been raised again.

Response: This has been overtaken by East Renfrewshire successful challenge to the legal action on its local plan. No change is therefore proposed to the Alteration.

Issue: The Scottish Executive have stressed that there is no necessary commitment to any schemes in the Plan and have drawn attention to its policy in for new motorway junctions.

Response: This is accepted and is recommended it is reflected in the Plan, for the avoidance of doubt.

STRATEGIC POLICY 5 – COMPETITIVE ECONOMIC FRAMEWORK

Issue: The 5 additional identified Strategic Industrial and Business Locations (SIBLs) are supported, particularly Barrhead and Ravenscraig. Representations

raise the need for flexibility in the policy requirement to safeguard these locations from inappropriate alternative uses.

Response: it is not proposed to alter the wording of Strategic Policy 5 from the approved plan. Flexibility is built in to Structure Plan allocations through Strategic Policies 9 and 10.

Issue: Representations support the identification of Ravenscraig as a Regionally Important Safeguarded High Amenity Location. Objection to the identification of Darnley Mains as a regionally important high amenity location focuses on the site being unsuitable for business development and the effect of the designation on development options.

Response: SPP2 supports the identification of regionally important high amenity locations. The identification of Darnley Mains as a high amenity business location is consistent with the need to provide a range of development opportunities across the Structure Plan area, and is not intended to limit the development potential of the wider area.

Issue: The addition of University Campuses to Strategic Policy 5 in recognition of their contribution to the economy of the Structure Plan area is widely supported. Additional commentary on the role of universities and associated science and innovation parks in economic development and regeneration is sought. The identification of a city centre international educational and cultural quarter to mirror the proposed Kelvin Quarter is proposed. Representations also raise the need for flexibility in the policy requirement to safeguard these locations from inappropriate alternative uses.

Response: The Alteration highlights the contribution of the universities to economic development priorities, including the science and technology sector. Additional commentary on the contribution of universities can be provided in the economic development Action Plan. Glasgow City Centre, as identified in Joint Policy Commitment 1B incorporates the university campuses, therefore the additional identification of an educational and cultural quarter is unnecessary, and would distract from the need for an integrated approach to the City Centre. The policy allows for appropriate uses specific to the university campuses to be identified, therefore incorporating a suitable level of flexibility.

Issue: Representations were received supporting the proposed policy and promoting detailed changes to the locations identified in SP5 including:

- removal of Class 4 restriction at the Faskine national high amenity site
- removal of SIBL designation from Westerhill
- identification of Phoenix, Linwood as an urban renewal priority
- incorporating reference to Destination Loch Lomond
- identifying Clydebank Waterfront as a SIBL

Response: the Class 4 restriction at Faskine is established by national policy and it is therefore not within the scope of the Alteration to change the designation. Westerhill is retained as a SIBL but it is not considered necessary to give further recognition to the Phoenix site. Clydebank Riverside is now recognised in policy and Loch Lomond is already included in the approved plan.

Issue: the Alteration should require a full review of the established industrial and business land supply to enable reallocation of land to more appropriate uses and identification of new sites for business and industry which meet changing requirements.

Response: The Structure Plan requires a 10 year supply of land for business and industry. This not only safeguards the marketable land supply but removes the requirement to protect non-marketable land where there is sufficient land. Local

plan reviews offer the opportunity to review the allocated sites within the land supply context set by the structure plan.

STRATEGIC POLICY 6: QUALITY OF LIFE AND HEALTH OF LOCAL COMMUNITIES

GENERAL

The policy changes relating to local employment opportunities, environmental priorities and health issues have been supported in general. The main issues raised relate to housing and retailing issues which are considered below.

HOUSING ISSUES

Issues: In respect of the provision of land for new housing, a range of potential objections to the Plan have been raised by various house-building and other interests. These relate primarily to the desire for:

1. The use of more optimistic housing need forecasts
2. The use of less optimistic housing need forecasts
3. The use of local authority boundaries to define housing market areas
4. Quantitative Assessment of Demand
5. The request for further housing land allocations to address affordable housing issues
6. Provision of land in areas of higher market demand
7. Timescale of the of the Housing Land Supply/Demand Comparison
8. Scottish Water infrastructure constraints

Issue 1: Higher Forecast: The house building interests have requested that the Joint Committee use more optimistic housing need forecasts. Others have directly or indirectly asked the Committee to assess the implications of using lower level forecasts.

Response: The 2005 Plan is based upon long-term sustained economic growth and therefore allows for a higher level of demand for housing than would be justified by the current trends in migration and household formation. These figures have been updated in the light of the 2004 Mid-Year Population Estimates from the Registrar General for Scotland. Homes for Scotland (HfS) has asked the Joint Committee to test more optimistic assumptions but these would be difficult to justify, given the flexibility already built into the Structure Plan forecasts, including the use of lower out migration assumptions than used by the General Register Office (Scotland) (GRO(S)).

Issue 2: Lower Forecasts: Others interest groups have directly (Scottish Natural Heritage) or indirectly asked the Joint Committee to assess the implications of using lower level forecasts.

Response: Using the less optimistic GRO(S) migration and household formation forecasts for the Structure Plan Area would not be justified given the evidence that exists for assuming higher rates of growth (TR X/06 and TR Z/06). It would also reduce the rate of regeneration and renewal of the Glasgow and the Clyde Valley area which are national objectives.

Issue 3: HMA Boundaries: The boundaries to the housing market areas have been questioned, because these are not based on LA boundaries.

Response: The Structure Plan analysis is based upon community groupings which represent a more relevant basis for analysis for the identification of strategic linkages and local needs. The HMA framework constitutes a recognised valid

geography for the interpretation of the owner-occupied housing market within the Structure Plan area which has been approved by Ministers.

Issue 4: Quantitative Assessment of Demand: HfS view the projection methodology as an overtly quantitative assessment of demand which does not represent a sufficient representation of market demand, as it fails to address issues relating to unmet demand, price inflation, flexibility as well as range and choice of housing.

Response: The Joint Committee have projected an optimistic forecast of future housing demand and met the calculated demand in full. The types and level of completions are driven by the market and the significant amount of additional housing land supply released from the Green Belt to augment the existing effective and established land supply should enable the housebuilding industry to provide a range and choice of housing across all parts of the Housing Market Area framework.

Issue 5: Affordable housing needs: HfS members have requested that the Joint Committee take a more proactive approach to the issue of affordable housing, setting affordable housing targets for areas of identified need rather than the policy outlined in the Draft Finalised Plan to enable local authorities to address the issue of affordable housing in the respective Local Plans. HfS members have also requested additional housing land supply to allocations in areas identified as having affordable housing shortages to enable a percentage of this additional housing land supply to provide affordable housing.

Response: The 2005 Plan provides a policy framework for local authorities to provide housing land supply for the purpose of addressing affordable housing shortages within those local authorities with identified affordable housing needs.

Issue 6: Provision of land in areas of higher market demand: HfS and individual housebuilders have requested that the Joint Committee allocates additional housing land supply in areas of high demand e.g. East Dunbartonshire and East Renfrewshire. They consider that the Draft Plan is ignoring the market demand in these two local authorities.

Response: The Joint Committee has meet all demand in full within all parts of the Housing Market Area Framework. It should be noted that HfS do not seek a comparable reduction of housing allocations in other areas if more land was released from development from the Green Belt in these two areas.

Issue 7: Timescale of the of the Housing Land Supply/Demand Comparison: Certain respondents have highlighted that the 2005 Plan does not follow the advice in SPP3 that Structure Plans should include a 20 year vision of the location of longer term development since the Draft Plan only projects a detailed supply and demand comparison for housing land to 2018 from a base date of 2004.

Response: The Joint Committee consider it as inappropriate to project for longer than 14 years. This time horizon is double the period for the audits of the effectiveness of the land supply. However, the 2004-2018 timescale represents an increase on previous projection periods and is the longest projection period the Joint Committee has ever assumed. Furthermore, the Flagship Initiatives and Community Growth Areas have indicative capacities which extend beyond 2018, which in itself provides a longer term vision of development in the Structure Plan area.

Issue 8: Scottish Water infrastructure constraints: HfS have identified via an assessment of all eight relevant draft 2004 housing land audits that approximately half of the effective supply falls into the category of land with potential, rather than commitments or consents. This is presumed to relate to issues with drainage and

discharge consents from Scottish Water and presents doubts about the effectiveness of substantial parts of the land supply on infrastructure grounds.

Response: The Joint Committee has not accepted this analysis as a basis for additional housing land supply and is working with Scottish Water on a strategic approach to infrastructure provision, Scottish Water has acknowledge that the more strategic approach of the 2006 Plan to this issues is preferred than a shorter term and incremental approach to land releases.

RETAILING ISSUES

General: The responses to the retail issues raised matters which can be categorised into five main groups, namely the implications of a town centre hierarchy, the schedule of other retail locations, the sequential approach; matters regarding the capacity study and the status of Braehead. The following outlines the key retail issues raised in the responses to the latest consultation exercise, and sets out the Joint Committee's response to these issues.

Issue 1. The Implications of a Hierarchy of Town Centres: The key issues raised relating to the implications of a hierarchy of town centres fro retail policy are as follows:

1. the status that should be given to the promotion of centres as sub-regional centres within the hierarchy (Motherwell, Braehead, and Greenock)
2. the need for clarification about including Ravenscraig as a sub-regional centre and linking Ravenscraig and Motherwell;
3. the need for clarification of the role of the larger centres in Glasgow; and
4. the need to give greater status to Kirkintilloch
5. the potential inclusion of Linwood as a town centre in Schedule 1(a).

Response: despite attempts by the Joint Committee to clarify the purpose of a hierarchy in policy it will clearly result in continued confusion and a source of unnecessary policy debate. There are already clear policy requirements to consider the impact of new proposals and in the current plan led system especially with the proposed 'differentiation of types of applications that are proposed in the planning Bill, major proposals will be subject to special scrutiny. The introduction of a hierarchy is not therefore being pursued by the Joint Committee because while there was a level of support expressed in some responses for the introduction of a hierarchy it has been concluded that there would be potential uncertainty created in the application of the any policy, for example in terms of the application of the sequential approach or the basis for allowing centres to change their position in a hierarchy.

The Joint Committee therefore proposes that the existing Structure Plan network of town centres will be retained with the addition of Gourrock. It has however been concluded that Linwood should not be included within Schedule 1(a) as a town centre as its current level of occupied shopping floorspace does not merit such designation. Its inclusion in the Schedule will be reviewed in future alterations of the plan taking account of any developments which are approved or implemented.. It is proposed to add Kirkintilloch to the list of renewal priorities in view of the scale of action required. As a result of the hierarchy not being pursued, the linking of Ravenscraig and Motherwell as a sub-regional centre is also removed, although Ravenscraig and Motherwell are identified as town centres. This supports the established position on the future form of development of Ravenscraig, as set out in its 2003 Alteration.

Issue 2. Other Retail Locations (Schedule 6(c)(iv)): Concern has been raised about:

- (i) the need for clarification of the different roles played by Braehead and Lomond Shores;
- (ii) Strathkelvin Retail Park should be protected from out of centre developments

Response: The Joint Committee accepts the different roles played by the out of town centre retail developments at Braehead and Lomond Shores, and has recognised this in revising Schedule 6(c)(iii). The potential benefit of considering the appropriateness of existing out of centre developments, after town centre locations have been considered, in preference to new out of centre locations, and also in order to reflect the guidance contained within Scottish Planning Policy 8 Town Centres Consultation Draft (SPP8), is accepted by the Joint Committee. This is reflected in revising Schedule 6(c)(iii), which includes Strathkelvin Retail Park.

Issue 3. Sequential Approach: The key issues raised relating to the sequential approach are as follows:

1. whether major out of centre locations should have a lower priority than sub-regional centres
2. how Braehead and Lomond Shores should be regarded in the sequential approach;

Response: Many of the responses on this issue linked the application of the sequential approach to site selection with the centre hierarchy, an approach which implies that larger developments should be directed to higher order centres. The application of the sequential test to centres in a hierarchical way in order to determine which centre individual developments should be directed to was never advocated by the Joint Committee. The issue is no longer a matter relevant, however, as the introduction of a hierarchy is not being pursued by the Joint Committee.

In accordance with Draft Scottish Planning Policy 8 Town Centres a list of recognised out of centre retail locations has been included in the Plan. These include retail warehouse locations, and the two out of centre locations at Braehead Shopping Mall and Lomond Shores tourism centre. It is not considered appropriate however to create potential pressure on Lomond Shores as a preferred alternative to other locations for general retailing in view of its special role and location by making it the preferred out of centre retail location in the area, which inclusion in the sequential approach would require.

Similarly the Joint Committee have considered the representations from various parties, including Renfrewshire Council about the desirability of recognising Braehead in the sequential approach. This is complicated by the extensiveness of the Braehead Catchment which covers much of the western part of the conurbation. It would be impractical if not undesirable for all out of centre proposals for the relevant authorities outwith Renfrewshire to have to apply the sequential approach to proposals in their area. It is accepted however that it might be appropriate for Braehead to be considered as the preferred alternative to other out of centre sites in Renfrewshire but this is a matter to be determined through the Local Plan.

Issue 4. Capacity Study: The key issues raised relating to the capacity study are that it has been suggested that:

1. Turnover is overestimated and expenditure is underestimated, especially relative to the 1997 estimates;
2. The allowance for additional floorspace is too high;
3. the Plan should not set a scale of floorspace requirement for Schedule 6(c)(iv) locations;

4. Capacity assessments should be used with caution and act as a guide;
5. Qualitative assessments should be used; in particular there are suggested to be qualitative requirements at Kelvinside, Pollokshaws, Scostoun, Airdrie and Bellshill, Cambuslang, Carluke, East Kilbride, Larkhall, Erskine, and Renfrew.

Response: The Joint Committee has based its expenditure estimates on Mapinfo data and has used Joint Assessor and Valuation Boards floorspace figures, planning consents and Retail Rankings (2005 Edition) for turnover wherever available. Where Retail Rankings figures are not available, i.e. for some retailers and for all centres, estimates have been used. The Joint Committee believes these sources are the most appropriate and generally acceptable sources of information available. Only one respondent questioned the use of Retail Rankings as a source of data, and the use of the other sources were broadly accepted by the respondents. In addition, a number of sensitivity tests have been carried out to establish the appropriateness of a number of assumptions used in the assessment, for example annual expenditure growth. The sensitivity tests confirm the use of the capacity study results is reliable for informing Structure Plan policy. The capacity study has been revised with new annual expenditure growth assumptions included for both convenience and comparison shopping, using Mapinfo (Information Brief 05/02) guidance on the most appropriate rates to use.

The Floorspace data has therefore been updated and confirmed by the local councils. These are reflected in a revised technical note (TR X/06), but these do not affect the areas that have been identified as requiring additional new or improved Floorspace. Further consideration has been given to the appropriateness of including the scales of additional floorspace equivalent in Schedule 6(c)(iv) (this may be from new floorspace, reduced vacancy or more efficient floorspace) that should be planned for in local plans. The Joint Committee has concluded that it is appropriate to include floorspace requirements for the locations identified within Schedule 6(c)(iv). This will assist in guiding local plans and developers towards appropriate scales of development in order to meet the identified needs and to give a degree of confidence in assessing compliance with Structure Plan policies.

Retail capacity assessments are seen as one tool to be used in guiding the Joint Committee in considering the appropriateness of significant retail proposals. Schedule 6(c)(i) indicates other considerations which will be used to assess significant retail proposals. These include impact, including cumulative impact, the contribution to improving the vitality and viability of town centres, and the contribution the proposal would make in remedying any qualitative deficiencies in the existing retail provision. The approach adopted by the Joint Committee has however identified those centres where the level of trading could be more effective in performing their role as a town centre if there were a qualitative improvement in the centres.

It will however be for the local planning authority to consider whether there is any further action to meet any qualitative deficiencies. No details have been provided as to the methodology used to identify the qualitative shortfalls that have been asserted by Asda. It should however be noted that as indicated above in relation to capacity studies, a qualitative shortfall alone is not sufficient by itself to justify additional floorspace, as there are other considerations such as capacity, impact and contribution to vitality and viability.

Issue 5: Status of Braehead: Capital Shopping Centres has maintained its concern about the lack of recognition of Braehead as a Town Centre in the Plan.

Response: There has been no substantial change in the status and function of Braehead from the previous Structure Plan assessment to justify a change in the

policy position on Braehead. The role of Braehead in the renewal of the Renfrew Waterfront is however now accepted and recognised as part of the Clyde Waterfront Flagship Initiative. In addition it has been added to Schedule 6(c)(iii) and required to be taken into account through the provisions of Schedule 6(c)(i) in the assessment of out of centre proposals.

STRATEGIC POLICY 8: POLICY FOR RENEWABLE ENERGY

GENERAL

There has been general support for the proposed changes in this policy in respect of forestry and woodland development. The changes proposed in the framework for the promotion of wind energy raised a number of issues discussed below.

WINDFARM DEVELOPMENTS

Issue: Definition of Threshold of ‘Significance’: Representations for commercial interests either do not want any threshold (the scale of development specified in the plan of potential significance) or believe that there is no justification for the strategic threshold to be changed to 20MW and believe it should go back to 50MW as set out in the Consultative Draft Plan.

Response: There is limited information to justify any target, but the reduction scale to 20MW better reflected experience in terms of the range of developments for which applications had been made in Scotland. To have no scale would leave all developments as potentially significant in terms of scale, and require smaller developments to be considered as potential significant departures from the Plan. This threshold will however be monitored and reviewed if necessary.

Issue: The introduction of the concept of Potential Areas for Windfarm

Development: Acceptance from many in the industry that the change in reference is a good idea as it gives more flexibility to sites. Apart from the Scottish Renewable Forum which thinks the use of the word Potential is confusing.

Response: It is considered that the new terminology better reflects the need for detailed local planning before areas can be designated as ‘preferred’ for development.

Issue: Identification of ‘Potential’ Areas for development: There are conflicting representations. There is objection to the use of the South Lanarkshire Landscape study (SLLS) for assessing the suitability of siting windfarms in the RSA because it has not been scrutinised and conflicts with the views of SNH that windfarms in the RSA ‘could be acceptable in principle’. There is also concern that it is in conflict with NPPG6 as it is overly restrictive and gives too much protection to the RSA, which should not be given the same protection as National or International Designations. SNH however are still concerned that the Plan has included areas which conflict with their Strategic Locational Guidance. They also say that one of the Potential areas still includes parts of an SPA and SSSI and this should be altered. This is not their final comments and they say they need more time to look at the revised Technical Report that we sent them.

Response: The use of the SLLS to avoid taking a standard approach to all areas with a landscape designation contrary therefore to the representations received from commercial interests. The issues raised by SNH have been discussed with them and their concerns are being met by adjustments to the diagram and to the text of the Technical Report (X/06).

Issue: Policy in Potential Areas: Representations have suggested that there is an conflict between Strategic Policy 8 and 9 and that once an area is identified as having Potential it should not have to be considered against Strategic Policy 9. There are also various comments about the wording of policies in relationship to windfarms.

Response: This representation fails to understand that all development proposals in the Structure Plan have to be consistent with a wide range of policy objectives and that an integrated approach reflected in Strategic Policy 9. It is considered that the existing policies provide sufficient guidance on those matters that need to be taken into account in determining whether a proposals is a departure from the plan and what factors should be used to evaluate such a proposal.

Issue: Buffer Areas around SPAS: SNH are concerned about the need for buffer areas around the SPAs and how they relate to the Potential Areas identified in the Structure Plan Alteration.

Response: The Policy has been changed to remove the presumption in favour of development that would be implied by 'preferred area' designation. The 'potential area' designation requires that Strategic Locational issues including those matters raised by SNH should be assessed at the local plan and individual application stage. Revisions that deal with these concerns of SNH have been made to the Technical Report. SNH are currently considering these changes and will be sending in their comments by the end of January.

Issue: Policy for areas outside Potential Areas and Smaller Windfarms: All representations from those with commercial interests seek the introduction of a policy approach for outside the Potential Areas.

Response: The current proposed policy is more flexible and accepts that smaller windfarms could be sited outside the potential areas subject to the provisions of the Plan and local plans. It however considered that major windfarms could have strategic concerns.

Issues: General Renewables: There is concern that there is no explicit support in the Plan for other forms of renewables, like biomass on derelict land and general renewables on old mining sites. Balties raise specific issues with particular reference to the possibility of Energy from Waste.

Response: It is accepted that the Plan does not have explicit policies for all forms of energy. At present there is not sufficient context to provide a robust framework for their promotion of other forms of renewable energy. The Joint Committee is committed to undertaking further work on this matter in the context of its climate change initiative. In the meantime the current overall approach and policies are adequate for evaluating proposals.

OTHER ISSUES

WASTE MANAGEMENT

Issue: The Alteration should reflect the changes in waste management priorities since the 2000 Plan, and should reflect national policy (NPPG10 and the National Planning Framework). A clear steer for local plans on providing a suitable waste management network is required.

Response: The waste management section has been updated to reflect national policy and support the provision of a suitable network of waste management facilities across the conurbation.

Issue: Concern has been raised that the Structure Plan does not adequately address the potential of energy from waste

Response: The section on waste management has been updated to reflect the emerging waste management strategy in Glasgow and the Clyde Valley and the need to manage non-municipal waste streams. Potential treatment options, including energy from waste, are identified.

Issue: The Alteration should specifically refer to the need for local plans to safeguard existing waste management facilities and provide guidance for the location of new facilities.

Response: The amended waste management paragraphs require local plans to identify suitable locations for waste management facilities to meet necessary capacity increase and support the Area Waste Plan.

HEALTH AND SAFETY

Issue: EC Directive 96/82/EC requires structure and local plans to have regard to the objective of preventing and limiting the consequences of major accidents and maintaining appropriate distances between establishments and residential and public areas and areas of particular natural interest or sensitivity.

Response: Schedule 9B requires development to avoid negative impact on health and safety. This incorporates the requirements of the COMAH regulations.

Format of Strategic Policies 9 & 10

Issue: The Scottish Executive has suggested that the potential revisions to the policies do not add any greater clarity

Response: It is proposed to retain the format in the 2000 Plan.

Urban Design Issues

Issue: ADS has asked for the following amendment to be made to paragraph 2.13 of the Plan Alteration.

Planning Authorities should promote high quality design standards in architecture and urban form through the preparation and use of design-based policies in local plans and supplementary planning guidance. These delivery mechanisms should advance the six qualities spelt out in the Policy Statement for Scotland 'Designing Places' as being at the heart of good design for urban and rural development, which are:-

- identity;
- safe and pleasant spaces;
- ease of movement;
- a sense of welcome;
- adaptability;
- good use of resources.

Pursuit of these qualities within an area requires:-

- an evidence-based, systematic approach to analysing site context and the overall character of an area;
- a comprehensive, integrative strategic approach to the examination of land use, urban design, architecture, open space/landscape, movement, historic environment, infrastructure, economic and social factors;
- a vision for the area's future, prepared in an open and inclusive manner;

- 3-Dimensional design proposals which enunciate clearly how the six qualities from 'Designing Places' will be delivered at the local level.

Response: This late suggestion is in keeping with the spirit of proposed Alteration. The principles involved in this suggestion are accepted and appropriate alterations are suggested should be made to reflect them by the Structure Plan Manager, in consultation with the Steering Group.

Appendix I - Scenarios and Visioning Groups Organisations and dates

The Structure Plan is one of a number of public arena strategies that will influence the future shape of the metropolitan area. As part of a 'joined-up' approach by the public sector, the Structure Plan Joint Committee has been an integral member of a joint public sector exercise, led by Scottish Enterprise Glasgow, to build a common 'Vision' framework within which the various public arena strategies are aligned and combined to achieve the 'Vision'. In this way, the Structure Plan and other such public sector strategies become part of a joined-up approach to the future of the region.

This work has been led and managed by a multi-organisational team, drawn from Scottish Enterprise Glasgow, Glasgow City Council, the Joint Committee, North Lanarkshire Council, Strathclyde European Partnership, Scottish Enterprise Lanarkshire, and Glasgow University Business School, with facilitation and management by a private sector consultancy, 'Frontline'.

The process effectively originated in thinking from 2003 when a major review/alteration of the Structure Plan was mooted and decided upon by the Joint Committee. The core work took place in the period since summer 2004. The programme of meetings is set out below and demonstrates the Joint Committee's commitment to joint working with fellow public arena stakeholders.

March 25, 2003 – Inception Meeting

June 9, 2003 – Inception Workshop

September 1, 2003 – Workshop

August 3, 2004

August 17, 2004 – Workshop

September 28, 2004

November 12, 2004

January 14, 2005

March 1, 2005 – Workshop

March 16, 2005

March 29, 2005

April 29, 2005

May 12, 2005

June 2, 2005

June 16, 2005

December 7, 2005

January 18, 2006 - Workshop

Other Stakeholders involved in the process include

All eight GCV Local Authorities, Scottish Enterprise National, Scottish Enterprise Dunbartonshire, Communities Scotland, Forestry Commission, Scottish Natural Heritage, Scottish Environment Protection Agency, Scottish Water, Strathclyde Passenger Transport.

Appendix II - Thematic Action Programmes – Organisations and dates

INTRODUCTION

In order to secure an increasing long-term implementation of the MDS, the Joint Committee has sought to develop, with key stakeholders, a series of thematic Action Programmes. The development of these Programmes has been a priority for targeting the participation of and consultation with several key stakeholders organisations in the preparation of the 2006 Alteration.

The Thematic Action Programmes comprise

- The Economic Development Action Programme
- The Green Network/Greenspace Action Programme
- The Health Action Programme
- The Transport Action Programme
- The Scottish Water Action Programme
- The Vacant & Derelict Land Action Programme

The Economic Development Action Programme – jointly with Scottish Enterprise and the Local Enterprise Company network.

The Green Network/Greenspace Action Programme – jointly with the constituent Local Authorities, the Forestry Commission and Scottish Natural Heritage, with the involvement of private sector Consultants. The Green Network is a foundation component of the MDS and securing its implementation, strategically and locally, is a Joint Committee core priority. The following list of meetings, workshops and study visits was undertaken with the above listed stakeholders with a view to developing that implementation into the longer-term.

November 24, 2004
December 3, 2004
June 15, 2005
June 28, 2005
July 11, 2005
September 28, 2005
November 28, 2005
December 7, 2005
January 6, 2006
January 11, 2006

The Health Action Programme – jointly with the Glasgow Centre for Population & Health, Health Scotland and the constituent Health Boards (4). The following list of meetings and workshops was undertaken with these organisations.

February 28, 2005
April 15, 2005
June 23, 2005
September 27, 2005
September 30, 2005
October 6, 2005
October 10, 2005
October 24, 2005

November 9, 2005
December 6, 2005
December 9, 2005

The Transport Action Programme – jointly with SPT, the constituent Local Authorities, Adjoining Local Authorities, and WESTRANS Joint Committee

The Scottish Water Action Programme – the following list of meetings was undertaken with Scottish Water; including consideration of capital investment programmes, development constraints funding, strategic priorities, and future development funding.

April 9, 2004
April 26, 2004
May 12, 2004
July 13, 2004
July 27, 2004
September 17, 2004
January 27, 2005
February 11, 2005
April 11, 2005
May 19, 2005
June 24, 2005
July 12, 2005
August 26, 2005
November 1, 2005
December 15, 2005
January 6, 2006

The Vacant & Derelict Land Action Programme – jointly with the

Appendix III - Scottish City-Regions & Adjoining Authorities – Consultation Seminars and dates

The Joint Committee, in preparing the Alteration 2006, commissioned detail economic modelling in support of its 'growth agenda', with a view to underpinning its development requirements. That modelling, jointly sponsored by Scottish Enterprise National, was undertaken by the Regional Forecasts Consultancy. In undertaking this work, it utilised a set of nested economic models which identified the contribution of the metropolitan area to the wider Scottish, UK and European economies and was predicated on equal performance by other regions, in order to achieve the 'growth agenda'.

The modelling did not regard the metropolitan area in isolation or that it needed to abstract economic resource and performance from other regions to sustain its own.

In order to build a consensus on the 'growth agenda' and to consult on the relevance of the JC's Strategy and policies to other city-regions and adjoining local authorities, the Joint Committee undertook a programme of meetings and workshops. The relevant dates are set out below -

October 21, 2004
June 6, 2005
June 10, 2005
September 6, 2005
November 3, 2005

Appendix IV - Consultative Fora and Thematic Focus Groups – Organisation and dates (to be added)

As set out in paragraph 1.2 to this Statement, the Scottish Ministers directed, in their Decision letter on the 2000 Plan, that the Joint Committee undertake more specific consultation and liaison with two target stakeholder groups – the retail industry and the wind energy industry. In order to facilitate this work, the Joint Committee constituted two Consultative fora, one for each objective. The Joint Committee, in doing this, sought to engage as many organisations and companies within these industries as is feasible.

A decision was taken by each forum that a smaller Focus Group be established to undertake the more detailed liaison with the Joint Committee.

The dates of the relevant meetings and workshops are set out below, along with the organisations represented on these groups.

Retail Consultative Forum – October 6, 2003

**Retail Focus Group – May 4, 2004
 November 8, 2004
 November 21, 2005**

**Appendix V – Structure Plan Alteration 2006 – Meetings by Organisation and dates
(to be added)**

Appendix VI - Stages of Consultation, Alteration 2006 – Consultees (being finalised)

List of Organisations and Individuals Consulted or from whom responses were received by the Joint Committee at Relevant Stages of the Plan-making Process. This list does not include the names of Community Councils, MPs, MSPs and MEPs - all of whom were consulted by the Local Council - except where a formal response was received (to be added)

Appendix VII - Advertisements, relevant Newspapers & Local Consultees

| | | |
|------------------------------------|--|----------------------------------|
| GCVJSPC | <i>The Herald</i> | <i>May 10, 2005</i> |
| | | <i>October 21, 2005</i> |
| | <i>The Edinburgh Gazette</i> | <i>May 10, 2005</i> |
| | | <i>October 21, 2005</i> |
| East Dunbartonshire Council | <i>Kirkintilloch Herald</i> | <i>May 11 & 18, 2005</i> |
| | | <i>October 26, 2005</i> |
| | <i>Milngavie & Bearsden Herald</i> | <i>May 13, 2005</i> |
| | | <i>October 21, 2005</i> |
| | <i>Bishopbriggs Herald</i> | <i>May 11, 2005</i> |
| | Community Councils | |
| | Baldernock | |
| | Bearsden east | |
| | Bearsden west | |
| | Bearsden north | |
| | Bishopbriggs | |
| | Campsie | |
| | Kirkintilloch | |
| | Lenzie | |
| | Milngavie | |
| | Milton of Campsie | |
| | Torrance | |
| | Waterside | |
| East Renfrewshire Council | <i>Barrhead News</i> | <i>May 11 & 25, 2005</i> |
| | <i>Eastwood Extra</i> | <i>May 12 & 26, 2005</i> |
| | <i>Eastwood Extra</i> | <i>October 26 & 27, 2005</i> |

Community Councils & Others

Barrhead
Busby
Clarkston
Eaglesham
Giffnock
Mearns
Neilston
Stamperland/Netherlee
Thornliebank
Uplawmoor
East Renfrewshire Chamber of Commerce
Renfrewshire Chamber of Commerce
Carts Greenspace
Members of Parliament
Members of the Scottish Parliament
Clarkston Town Centre Partnership

Glasgow City Council

Evening Times

May 10, 2005

October 21, 2005

Community Councils & Others

Community councils (75 in number)
Members of Parliament
Members of the Scottish Parliament
Members of the European Parliament
Local Organisations & Interest Groups (154)

Inverclyde Council

Greenock Telegraph

May 10 & 17, 2005

October 31, 2005

North Lanarkshire Council

Cumbernauld News

May 11 & 18, 2005

October, 2005

Kirkintilloch Herald (North Lanarkshire Edition)

May 11 & 18, 2005

October 2005

Kilsyth Chronicle

May 18, 2005

October 2005

Kilsyth Herald

May 11, 2005

Wishaw Press

May 11 & 18, 2005

October 2005

Bellshill Speaker

May 12 & 19, 2005

October 2005

Airdrie & Coatbridge Advertiser

May 11 & 18, 2005

October 2005

Motherwell Times

May 12 & 19, 2005

October 2005

West Lothian Courier

May 13 & 19, 2005

October 2005

Renfrewshire Council

Paisley & Renfrewshire Gazette

| | |
|-------------------------------------|------------------------------|
| | <i>May 11, 2005</i> |
| | <i>October 26, 2005</i> |
| <i>Paisley Daily Express</i> | <i>May 10 & 20, 2005</i> |
| | <i>October 26, 2005</i> |
| <i>Paisley Gazette</i> | <i>May 11, 2005</i> |
| <i>Johnstone Gazette</i> | <i>May 11, 2005</i> |
| <i>Linwood Gazette</i> | <i>May 11, 2005</i> |

Community Councils & Others

Community Councils
Members of Parliament
Members of the Scottish Parliament
Paisley Chamber of Commerce
Renfrewshire Valuation Joint Board
Rolls Royce Plc
SEPA West Region
SNH Area Manager
Paisley Vision Board
Clyde Muirshiel Regional Park
University of Paisley
Reid Kerr College
Paisley Partnership Regeneration Company
Communities Scotland (Paisley)
Lochwinnoch Nature Reserve
Argyll & Clyde Health Board
Private Companies (13)

| | | |
|----------------------------------|-----------------------------------|------------------------------|
| South Lanarkshire Council | <i>Hamilton Advertiser</i> | <i>May 12 & 19, 2005</i> |
| | | <i>October 27, 2005</i> |
| | <i>East Kilbride News</i> | <i>May 11 & 18, 2005</i> |
| | | <i>October 26, 2005</i> |
| | <i>Rutherglen Reformer</i> | <i>May 12 & 19, 2005</i> |
| | | <i>October 27, 2005</i> |
| | <i>Lanark Gazette</i> | <i>May 12 & 19, 2005</i> |
| | | <i>October 27, 2005</i> |

| | | |
|------------------------------------|--|-------------------------|
| West Dunbartonshire Council | <i>Clydebank Post</i> | <i>May 12, 2005</i> |
| | | <i>June 02, 2005</i> |
| | | <i>October 27, 2005</i> |
| | <i>Dumbarton & Vale of Leven Reporter</i> | <i>May 11, 2005</i> |
| | | <i>June 01, 2005</i> |
| | | <i>October 26, 2005</i> |

VIII - Technical Notes and Reports –

Survey Reports and Technical Working Papers issued during the consultation process (to be added)

Appendix IX – (to be added)

APPENDIX X – ROYAL ORDNANCE FACTORY, BISHOPTON

ABSTRACT OF REPORT TO PLANNING AND DEVELOPMENT POLICY BOARD - Renfrewshire Council

On 10 January 2006

By: DIRECTOR OF PLANNING & TRANSPORT

Concerning: The Glasgow and Clyde Valley Joint Structure Plan - Alteration 2005 - Draft Finalised Supplementary Written Statement - Royal Ordnance factory Bishopton

“4.6 The identification of the Royal Ordnance Factory site was considered by the Planning Board at the meeting of 9 August 2005. In respect of the Bishopton site the board agreed that:-

The Royal Ordnance Bishopton site should be identified as being suitable, in principle, for inclusion in Schedule 1(c) with the final determination of the nature and scale of development being subject to the grant of planning consent for the redevelopment of the site. The Council acknowledges the concerns of the local community in respect of the proposals for the redevelopment of the site and will give careful consideration to the concerns raised during the preparation of the Finalised Plan and in relation to any planning application which is submitted in respect of the development of the site.

There has been a substantial level of response from the local community in respect of the proposed designation of the Royal Ordnance site for urban expansion.

- 4.7 In response to the Consultative Draft consultation there were 26 letters of objection received directly relating to Royal Ordnance Factory. A standard objection letter was also submitted by the Bishopton Action Group with a list of 2474 names and addresses in support of it. In addition a further 10 representations referred to the Royal Ordnance Factory site, some in support and others not opposing the development proposal but raising various questions.
- 4.8 There have also been a substantial number of representations received in response to the consultation on the Finalised Alteration. These will be reported to the Joint Structure Plan Committee at the meeting on 30 January 2006 and taken into account when the Committee reaches its decision on the Alteration to be submitted to the Scottish Ministers. As of 15 December The Structure Plan Manager had received a total of 2253 representations comprising 33 individual representation letters, 1633 standard letter representations and 587 standard letter representations with additional comments which were forwarded by the Bishopton Action Group. These representations restated many of the matters raised in response to the Consultative Draft but also raised new issues, particularly in relation to the Finalised Written Statement, and its supporting documents including Technical Note TRB/05 - Report on the Assessment of Potential Areas for Urban Expansion, and the Environment Report.
- 4.9 The main issues of concern raised in the objections relate to:-
1. Contamination. The risk to the health and safety of residents, arising from the existing contamination and the development of the site; responsibility for assessing contamination and for undertaking and “policing” the remediation of

the site; a lack of information on what contamination exists and how the remediation will be undertaken; legal liability for remediation

2. The impact on natural environment and wildlife on the site as a result of its development; lack of landscape assessment; impact on greenbelt between Bishopton, Houston and Bridge of Weir.
 3. The impact on transport facilities. The concerns include increased congestion; impact of new roads; added demands on already overcrowded rail service; lack of parking at the station, no commitment to new junction on to M8.
 4. Scale of the development. Residents raise concerns over the proposed scale of the development in relation to the existing village and the effect this will have on the character of the village. There were also concerns that the new development will be separated from the existing village by the rail line and that there will be a lack of cohesion between the two halves of the expanded village.
 5. Need for development. The need for additional housing and business land is questioned.
 6. Effect on infrastructure and facilities. There is concern that a new development will lead to strains on existing infrastructure and social and community facilities, school provision in particular; also lack of information on proposals and no commitment to providing infrastructure and facilities.
 7. Lack of consultation and lack of regard for objections which have been submitted
 8. Lack of consideration of alternative locations.
 9. Inclusion of site as Community Growth Area in Structure Plan before detailed assessment of contamination has been undertaken.
- 4.10 It is clear from the responses to the consultations that the local community have serious concerns over the development proposals for the Royal Ordnance Factory site. In response to these concerns and in order to gain a better understanding of them and to inform local residents of the planning position and future planning processes, the Structure Plan Manager and Council staff have variously met with interested parties from Bishopton. These include the following meetings:-

1. Bishopton Community Liaison Group - 31 August 2005
2. Bishopton Action Group - 27 September 2005
3. Bishopton Community Liaison Group - 31 October 2005
4. Public meeting at Bishopton Community Centre - 2 December 2005

In addition, members of staff of the Environmental Services Department and SEPA attended a meeting arranged by Bishopton Community Council on 21 June 2005 where a presentation was made on contamination and remediation. The briefing for Community Councils on the Draft Alteration which was held on 29 November 2005 was attended by seven members of the Bishopton Community Council and Bishopton community and was almost wholly given over to a discussion of the treatment of Royal Ordnance Factory site in the Structure Plan Draft Alteration. A briefing on the Royal Ordnance Factory site was provided at the meeting of the

Riverside Community Plan Forum on 10 November 2005. Residents from Bishopton have also attended the recent meetings of the Joint Structure Plan Committee.

- 4.11 There have also been meetings with BAE Systems, the site owner and Redrow, their development partner. Such pre-application discussions are recommended by the Scottish Executive as best practice and are aimed at ensuring that any applications for planning consent which are submitted are complete and provide sufficient information for the Council to deal with them. The meetings have also provided information on the progress by BAE / Redrow in preparing development proposals for the site.
- 4.12 These meetings, together with the representations received in response to the consultations, have provided a better understanding of the nature and scale of the concerns related to the development of the Royal Ordnance Factory site. It is evident that there is a lack of confidence amongst a sizeable proportion of the local community in the processes involved in the assessment of development proposals for the site: in particular there are major concerns over the treatment of the contamination on the site and the implications which this will have for the health and safety of local residents and residents in any houses which are built on the land. There are also strong concerns in respect of the impact which the development of the site will have on the existing village. It is important that the procedures which will be undertaken to assess these issues are clarified and I have attempted to do this in this report.

Role of Structure Plan Draft Alteration

- 4.13 In considering the merits of the Draft Alteration to the Structure Plan it is important to clearly define the role of the Structure Plan and its relation to the assessment of any planning applications which may be submitted for the site. The Structure Plan will provide a strategic context for the release of land to meet long term housing demand. The Royal Ordnance Factory site is one of several sites across the Structure Plan Area which have been identified to meet this demand. The Draft Alteration states that the nature and scale of development at Bishopton will be defined through master planning and local planning. The mechanism to achieve this in respect of the Royal Ordnance factory site will be the assessment of the planning applications which it is understood will be submitted in spring 2006. Further details of these are given below. If the planning applications are approved, the proposals will subsequently be incorporated into the Renfrewshire Local Plan through the alteration procedure. If the development of the Royal Ordnance Factory site is found to be unacceptable through the assessment of the relevant planning applications then alternative sites for release will have to be found. The Draft Alteration therefore provides a strategic planning context within which the merits of the development proposals for the Bishopton Royal Ordnance Factory site can be considered. The Scottish Ministers have a target of 40 weeks to issue their decision on the Alteration. The Council will not determine any applications relating to the development of the site until the decision of the Scottish Ministers has been issued and come into effect.

Planning applications for the Bishopton Royal Ordnance Factory site

- 4.14 BAE Systems who own the site and Redrow Homes, the main developer, have advised that it is their intention to submit planning applications for the remediation and development of the site shortly after the submission of the Structure Plan Alteration to the Scottish Ministers. It is understood that three applications will be submitted initially. These are:-

- (i) Application for outline consent.
The principle application will be for outline planning consent for the proposed development. This will cover all aspect of the uses proposed for the site. It will also include a master plan showing the proposed pattern of land use and facilities to be provided.
- (ii) Application for remediation of the site.
This will be a detailed planning application for the remediation works i.e. the groundworks and other land engineering operations required to decontaminate the site and make it safe and suitable for the proposed new uses.
- (iii) Application for landfill
A detailed planning application for landfilling i.e. for approval for use of part of the site for the deposit of contaminated material which cannot be cleaned and recycled for re-use and which will not be removed from the site.

It is anticipated that a further detailed application for planning consent for the motorway junction works will be submitted later in 2006. Whilst it is not possible to provide a comprehensive list of all of the documentation which will be required, it is expected that the initial three applications will include the documents listed in Appendix 1.

Assessment of planning applications

- 4.15 The planning applications which are submitted will require to be assessed within the formal statutory planning requirements and procedures and in terms of approved national, strategic and local planning policy and guidance. This includes:-
- (a) The National Planning Framework
 - (b) National planning policy and advice as set out in Scottish Planning Policies (SPPs), Planning Advice Notes (PANs) and in government circulars
 - (c) The strategic planning framework i.e. Glasgow and Clyde Valley Joint Structure Plan as amended by the Alteration.
 - (d) The Renfrewshire Local Plan

Relating the planning procedures to matters of concern raised in the consultation.

- 4.16 The majority of concerns raised during the consultation relate to the details of the proposals for the Royal Ordnance site. Many of the issues were raised and responded to at the public meeting of 2 December 2005 and the other meetings listed in paragraph 4.9 above. In summary the key issues are:-

- Risks to health and safety and responsibility for assessing contamination

The applications, particularly that for the remediation of the site will provide full details of the identified problems of contamination and its remediation. The Director of Environmental Services has advised that his staff have been in regular contact with BAE Systems and the Scottish Environment Protection Agency (SEPA) regarding the site. He has stated that if a planning application for the redevelopment of the site is received, his Department, and SEPA, will require to be satisfied that remediation measures proposed for the site are satisfactory and are carried out in line with current Scottish Executive guidance, to ensure that the site is remediated in a manner which will not affect the end users of the factory site or the current

residents in the vicinity of the site during the remediation phase of the works. BAE Systems will require, as part of their remediation plans for the site, to ensure that any treatment/removal of contaminated materials is undertaken in such a manner that it does not cause the escape of contaminants to the wider environment. SEPA will also be a statutory consultee on any applications for the development of the site and will be responsible for licensing activities involving waste disposal. Given the complex and technical nature of this work, the Council will as necessary take its own independent advice on these matters.

- Impact on natural environment, wildlife, landscape and green belt

These issues will be specifically addressed through the environmental statements which will be submitted with the applications, through the advice provided by Scottish Natural Heritage who are a statutory consultee and through detailed assessment against national planning policy and development plan policy.

- Transport

Transport matters will be covered by the Transportation Assessment and the Public Transport Strategy. The Scottish Executive as Trunk Roads authority as well as the Strathclyde Passenger Transport Executive will be consulted. The formation of a new access to the M8 will be assessed in relation to Scottish Transport Appraisal Guidance (STAG).

- Requirement for release of land for housing, scale of development, effect on character of village, and impact on infrastructure and facilities.

The need for the release of land to accommodate the long term housing requirements has been confirmed in the Draft Alteration. Issues relating to the impact of the development of the Royal Ordnance Factory site will be considered in detail in relation to the proposals submitted for the development of the site. The masterplan will provide the vehicle for assessing the acceptability of the proposals in relation to the issues raised by the community.

- Lack of information

The Planning applications will form part of the public register and all submissions from the applicant and consultees will be available for public scrutiny. The mechanisms to make such information readily available, including use of the Council's web site, are currently being investigated.

- Lack of consultation and lack of regard for representations which have been made.

As described above, the Structure Plan Joint Committee has now undertaken three consultation exercise in respect of the alteration and there have been a number of meeting held to discuss the Royal Ordnance Factory site. The Joint Committee has considered a report on representations received in respect of urban release areas and representations made in respect of the Draft Alteration will be considered by the Joint Structure Plan Committee at the meeting on 30 January 2006. A statement on consultation and representations received will be submitted to the Scottish Ministers when the Alteration is submitted for their approval.

- Lack of consideration of alternative Locations

The Joint Committee have undertaken an assessment of potential locations and have considered alternative locations proposed through the consultation process.

- Inclusion of Bishopton Royal Ordnance Factory site Community Growth Area before detailed assessment undertaken.

The planning system in Scotland is plan led and in accordance with this the Structure Plan seeks to give a strategic planning context for considering detailed issues through the submission of planning applications or through the local plan. The planning applications which BAE Systems and their partner propose to submit will allow detailed issues to be assessed in full before a final decision is made. In addition, no decision will be taken on the planning applications until the Scottish Ministers issue their decision on the Alteration and it comes into effect.

4.17 The Board will be required to determine the subsequent applications submitted relating to the development of the site. At which time the results of the assessment of the proposals together with details of the community's responses will be made available to inform the decision making process. The process will be open and transparent and it is hoped will satisfy the concerns expressed by the local community.

4.18 In view of the above it is recommended that the Royal Ordnance Factory site should be identified as a Community Growth Area in Schedule 1(c) of the Alteration and that the detailed acceptability of the development of the site should be assessed through the submission of planning applications including a masterplan for the site. The Council will, however, wish the Joint Committee to address certain issues contained in the schedules in Annex A of the Draft Finalised Supplementary Written Statement, these being:

- Housing Capacity and requirements at Royal Ordnance Bishopton Factory site

In Schedule 1(c) of the Draft Alteration the indicative capacity of the Royal Ordnance Factory site is shown as 2500 which is to be assessed through local planning and master planning. The estimated capacity previously provided by BAE was 2300 dwellings. The Draft Alteration includes indicative capacities rounded to the nearest 500 except in locations where the output has been finally confirmed. The Council will take the view that any additional housing over and above the 2300 capacity will require to be related to the provision of social rented / affordable housing.

The Draft Alteration rolls forward housing demand and supply to 2004 - 2011 and 2011 - 2018. The revised Schedule 6(b)(ii) underestimates the potential additions to the housing land supply from the Community Growth Areas in Renfrewshire. The estimate provided by Cass on behalf of BAE and Redrow in response to the consultation on the Finalised Alteration is based on a site start in 2008/09, with 400 dwellings being completed in the period to 2010/11. They envisage that 1312 dwellings would be completed in the later period of the plan, 2010/11 to 2017/18. Schedule 6(b)(ii) which shows the effective housing land supply and additions to the supply should reflect the rate of house building indicated by Cass as well as the indicative capacity for Johnstone South-West. The Schedule should show an additional supply in Renfrewshire of 400 for the period 2004-2011 and 1800 for the period 2011 - 2018. However it should be acknowledged that the details of phasing for any development of the Bishopton Royal Ordnance Factory site will be considered through the masterplan which will be submitted as part of a planning application covering the site and the final rate of build will in part depend upon the condition of the housing market during the period of development.”