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Scottish Environment
Protection Agency

Our Ref: SM/ND/local
structure

Your Ref:

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21 June 2005

Dear Vincent

GLASGOW AND THE CLYDE VALLEY 2025: CONSULTATIVE DRAFT STRUCTURE PLAN

Thank you for the letter to Campbell Gemmell giving SEPA the opportunity to comment on the above draft Plan. Campbell has passed the draft Structure Plan to me to respond. As you will be aware, SEPA considers the 2000 Structure Plan to be of considerable importance towards achieving sustainable development in this City Region – its review and update is therefore welcomed. SEPA's comments are outlined below, and follow the structure of the draft Plan.

1.0 General comments

1.1 The draft Structure Plan provides a good strategic overview of the challenges facing the City Region in the next 20 years, in order to sustain economic growth. SEPA is encouraged by the emphasis on the 'Corridor of Growth' approach and the resultant focus on growth through the regeneration and development of existing urban centres, while improving the green network and public transport infrastructure.

1.2 However, as set out in our comments on the Joint Committee's discussion document in January, there are a number of areas where SEPA consider clearer strategic guidance will help ensure that the Plan's aims and guiding principles are realised. The draft Structure Plan goes some way to address these earlier points, although clearer guidance in relation to waste water drainage provision, waste and flood management in particular are felt to be required. Further details regarding this are outlined below.

2.0 Introductory section

2.1 The introduction to the draft Plan, on page i, explains that only the proposed changes to the approved 2000 Structure Plan are set out. Despite this, there are a number of instances in the detail of the draft Plan when the proposed changes are not clear. For example section 2.13 (principles of urban expansion) states that "*The required scale and location of any urban expansion will be confirmed through the consultation process*" and 2.26 (Green belt review) states "*The existing areas designated as Green Belt will therefore be retained except where new areas of urban expansion are identified in the 2005 Plan*". This suggests that further details are still to be finalised, and it provides some uncertainty as to the detail of the proposed changes.

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- 2.2 Within the introduction, there is also reference to an Action Plan which is to accompany the 2005 Structure Plan. SEPA welcomes this, and given it will contain much detail on how the Plan will be implemented, trusts that a draft will be published at the finalised draft stage of the 2005 Plan.
- 3.0 Section 1 – Context for the Structure Plan Review
- 3.1 Key Themes – the retention of these three themes, and particularly the strategies emphasis on the green network, is supported.
- 3.2 Paragraph 1.14 & 1.18 - SEPA supports the recognition of the need to base growth on environmental improvements and investment in infrastructure. In this context it might be helpful to include reference to these aims being supported by delivery of sustainable waste management.
- 4.0 Section 2 – Implications for the Metropolitan Development Strategy
- 4.1 Paragraph 2.1 – the emphasis on new growth, in terms of new business and housing development, utilising brownfield land is supported.
- 4.2 Paragraph 2.4 – the aim to improve the quality of life to communities through improvements to the environment, accessibility and the renewal of core infrastructure is also supported.
- 4.3 Urban Capacity Assessment – SEPA is pleased to see that the Plan has re -assessed the contribution that brownfield land can make to development land supply and that brownfield redevelopment will continue to be promoted. This should reduce the need for greenfield releases. The need for long term Vacant and Derelict Action Programmes are also supported.
- 4.4 Urban Expansion Areas - the integrated approach which is reflected here is supported, particularly the significance attached to a move away from a car dependant pattern of development and the role of the Green Belt.
- 4.5 Urban Expansion Areas: Related Criteria – SEPA would highlight that constrained waste water treatment works and networks is also a key infrastructure criteria. As you will be aware this is a fundamental issue which can, and is, restricting new development.
- 4.6 Paragraph 2.20 – (a) Bishopton. This site may include contamination issues associated with historical land use activity. SEPA would therefore highlight that ‘renewal and redevelopment’ of the site could also include the need for remediation.
- 4.7 Paragraph 2.26 – the retention of the Green Belt is strongly supported.

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- 4.8 Paragraph 2.28 – ensuring that small settlements retain their identity should assist with infrastructure provision.

5.0 Section 3 – Infrastructure of Growth

- 5.1 Greenspace Infrastructure – the identification of greenspace as infrastructure which is necessary and integral for development is welcomed. SEPA considers that this illustrates that the Plan is taking a proactive stance with environmental principles.
- 5.2 Network priorities – the commitments outlined (paragraph 3.5), in terms of managing the demand of travel by private car and improved public transport through a new mass transit network, is strongly supported. This will help improve the quality of the environment within the region's larger settlements and help address areas of poor air quality in particular.

Water Services infrastructure

- 5.3 SEPA shares the view expressed in this section that the cost of addressing constraints in Scottish Water's sewerage (and water) network is considerable for the timescale of the Structure Plan and likely to be beyond the means of the Scottish Executive's Quality and Standards III Investment Programme (2006-2014).
- 5.4 Paragraph 3.11 outlines some of methods available for prioritising investment in Scottish Water's infrastructure. SEPA's view is that future investment within the Structure Plan area needs to be prioritised to those areas of greatest need in terms of environmental, economic and social benefit. In this respect, the Glasgow Strategic Drainage Plan is an important partnership project, of which SEPA is an active partner.
- 5.5 SEPA would highlight, however, that private systems within publicly sewered areas are not considered to be a solution to constrained Scottish Water waste water infrastructure. Investment in the strategic drainage network, as discussed in paragraph's 3.9 to 3.14 is the only available sustainable option. Indeed, as you will be aware, SEPA is opposed to any proposals which involve private discharges of treated sewage effluent in sewered areas given they might be contrary to the aims of the Urban Waste Water Treatment Directive. In this regard, SEPA would recommend that the 2005 Plan explicitly states that there will be presumption against development proposals within publicly sewered areas which propose using private sewage treatment facilities.

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- 5.6 Paragraph 3.10 refers to the Water Framework Directive (WFD) in the context of River Basin Management Plans (RBMP). It is stated that the 2005 Plan, through identifying investment priorities for infrastructure investment, will also provide a context for the RBMPs. It is inferred that this means water quality issues will be an important consideration. This is welcomed as the quality of the water environment within the metropolitan area is very poor (particularly within densely populated areas such as Glasgow City) and is almost a direct consequence of an ageing and failing sewerage infrastructure. SEPA supports this integrated approach and would welcome further discussion regarding the detail to be included in the Plan. It should be borne in mind that the WFD extends the scope of water quality from chemical and ecological quality to include physical characteristics as well, this may also have implications for development in the Plan area (river restoration, removal of culverts, flood prevention work etc).

Flood management

- 5.7 SEPA welcomes the inclusion and reference to SPP7: Planning and Flooding and its associated Planning Advice Note, PAN69. The intention to align the policies of the Plan to SPP7 is welcomed, particularly the commitment to avoid areas at flood risk and the need to safeguard the storage capacity of floodplains.
- 5.8 However, the statement in Paragraph 3.16 of the Plan appears somewhat contradictory, in that whilst it refers to the avoidance of flood risk, it then refers to 'landraising needed to secure new development'. SEPA would wish to see more explicit guidance in what the Plan is actually attempting to achieve in this Policy statement. A rewording, or in the case of Schedule 9 (B)(viii) the addition of the following phrase, below, may make the Policy more effective;

'Development in the functional floodplain will be considered to be contrary to the objectives of this Plan. In exceptional circumstances where land is required to facilitate key development strategies which come forward through the Structure Plan process, land raising may be acceptable provided compensatory flood storage is provided and the objectives of the WEWs Act are not compromised in so doing. The redevelopment of existing brownfield sites at risk of flooding may be addressed by Local Plans, although the impact on flood risk elsewhere must be considered, and mitigation measures applied.'

- 5.9 Whilst SEPA's Second Generation Flood Maps (Scotland) will provide a much improved basis on which to define areas at flood risk, significant uncertainties remain in the identification of areas at flood risk, not least the possible impact of climate change. On this basis the Plan should also emphasise a precautionary approach where there is any doubt over the nature of the flood risk.

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- 5.10 Urban flooding (surface runoff, sewer and urban watercourses) has been a significant problem in some parts of the Plan area. The Plan should ensure that strategic redevelopment in urban areas is managed carefully and that partnership approaches, such as the Glasgow Strategic Drainage Plan, are the mechanism by which development can be promoted whilst adequately managing the flood risk, as well as addressing other issues such as infrastructure constraints.
- 5.11 SEPA supports the endorsement of the use of Sustainable Urban Drainage Systems (SUDs), however it must be emphasised that SUDs facilitate both the attenuation and treatment of surface water runoff, such that water quantity, water quality and environmental issues are all taken account of.
- 5.12 The Structure Plan should also explicitly support the work of the Flood Liaison and Advice Groups which cover the Plan area, which are an essential forum for sharing advice / information, developing policy and providing input into Local and Structure Plan policies. This is especially relevant in the Glasgow and Clyde Valley Structure Plan area where flooding and flood risk can only be effectively managed by partnership working.
- 5.13 The Plan should also be actively encouraging a strategic, sustainable flood policy by ensuring that flood management options are assessed on a catchment basis in partnership working, to ensure that longer term flood management options can be achieved which may help offset some of the effects of climate change on flood risk.

Waste Management

- 5.14 Section 3.18 - SEPA would clarify that these targets were set by the Landfill Directive. The National Waste Strategy does include support for the use of targets and it quotes 2006, 2009, 2016 as the target years with 4 year derogation on these targets given to member states who landfill over a set threshold % of their waste. The UK targets are to reduce biodegradable municipal waste going to landfill to 75% of 1995 levels by 2010, 50% of 1995 levels by 2013 and 35% of 1995 levels by 2020 and this it is presumed is the basis for the figures in this section.
- 5.15 SEPA's letter in January (in response to the Joint Committee's Issues Paper), outlined the background & justification for a need to include broader strategic guidance for waste management in a review of the 2000 Structure Plan. I would refer you to the section contained within it regarding waste management. While perhaps it is considered that the style of the document limits the detail which could be included relating to this topic, SEPA is nonetheless disappointed that it is only proposed to update the explanatory text, and change little with regard to the 2005 Plan's policy. This is a significant missed opportunity given the national importance, in waste management terms, of the Glasgow and Clyde Valley area to achieving the objectives of the National Waste Strategy.

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5.16 SEPA would highlight that in its current form, the draft Plan does not provide–

- (a) A clear strategic policy statement for waste management; or,
- (b) Direction as to how Local Plans should respond to this issue in the context of Glasgow and the Clyde Valley.

As you will be aware, this is a requirement of NPPG 10. It is accepted that there is some uncertainty as to the approach to identifying the need and location for any new facilities in the Structure Plan area, as the draft Plan outlines in paragraph 3.19. However, SEPA does not consider this inhibits the Joint Committee's ability to include text and policies which address points (a) and (b) above, and SEPA recommends this as a minimum change. Indeed, faced with similar circumstances in recent years, other Local Authorities have addressed these points in their Development Plans.

6.0 Section 4 – Implications for the Development Frameworks of the Plan

Forestry

6.1 It is noted that Diagram 10 (b) highlights the importance of Riparian Woodlands, as part of the draft Indicative Forestry Strategy's Action Framework, which SEPA supports given the benefits this provides to the status of the region's water bodies.

Renewable Energy from Wind Sources

6.2 SEPA strongly supports strategies which promote the development and use of renewable sources of energy. While accepting that developments are not appropriate in all locations, consideration needs to be given to maximise the utilisation of renewable resources.

7.0 Air Quality

7.1 SEPA is disappointed that reference to air quality issues have not been updated in the draft Plan. As outlined in our comments in January, SEPA considers air quality to be an important strategic issue in the Glasgow & Clyde Valley area.

8.0 Strategic Environmental Assessment (SEA)

8.1 SEPA has responded separately on the draft Structure Plan's SEA Scoping Report via the Scottish Executive's SEA Gateway.

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