



Development Department  
Planning Division

Victoria Quay  
Edinburgh EH6 6QQ

Mr. Vincent Goodstadt  
Glasgow and the Clyde Valley Structure Plan Joint Committee  
10, Killermont Street  
Glasgow  
G2 3NW

Telephone: 0131-244 7533  
Fax: 0131-244 7555  
graeme.purves@scotland.gsi.gov.uk  
<http://www.scotland.gov.uk>

Your ref: G/7/4/2  
Our ref: ZPP/30/770/7

21<sup>st</sup> June 2005

Dear Vincent

## **GLASGOW AND THE CLYDE VALLEY 2025: CONSULTATIVE DRAFT STRUCTURE PLAN**

1. Thank you for your letter of 9<sup>th</sup> May inviting us to comment on the Consultative Draft Structure Plan. We have circulated the document to relevant divisions within the Scottish Executive and the comments which follow represent a corporate view. The comments under each chapter heading follow the structure adopted in the draft plan itself. They are made without prejudice to Scottish Ministers' consideration when the finalised plan comes before them.

### **General Comments**

2. We are concerned that the consultative draft structure plan leaves some key issues such as the hierarchy of centres, the allocation and phasing of housing land requirements, important aspects of transport strategy and policy on retailing, the extent of the green belt, the implications of Scottish Water's investment programme, and measures to deliver the national and area waste strategies unresolved. This reduces the opportunity to address objections between the consultative and finalised stages and creates a risk that contentious issues will not emerge until the finalised plan is submitted to Ministers. It will be important to ensure that your approach to consultation meets the requirement that adequate publicity is given to matters which it is proposed to include in a plan under Section 8(1)(a) of the Town and Country Planning (Scotland) Act 1997.

3. In commenting on the discussion document, *The Future for Glasgow and the Clyde Valley 2025*, the Executive emphasised the key role of Action Plans in securing delivery and stressed the need for a clear strategy to avoid blight. These comments remain relevant.

4. In Diagram 1, the significance of the settlements within Glasgow and the Clyde Valley identified by a brown outline circle is unclear, as they are not referred to in the key.



## Section 1: Context for the Structure Plan Review

5. We are not clear what is meant by the references to the “Government’s new agenda for growth” (paragraph 1.2) and “the growth being sought by the Government for Scotland by 2017” (paragraph 1.13). We also note that paragraph 1.9 refers to “Treasury Public Service Agreement Targets”. Public Service Performance targets are concerned with the improvement of public services and apply to UK Government Departments. The most relevant policy contexts for the Glasgow and the Clyde Valley Structure Plan are the *National Planning Framework for Scotland* and the *Framework for Economic Development in Scotland*.

6. In its comments on the discussion document, Communities Scotland indicated that there was a need to engage with other structure plan areas to assess the level of opportunity that exists and avoid the risk of displacement. The degree to which these discussions have taken place and to which sustained growth is deliverable in the light of known aspirations in other areas remains unclear. While paragraph 1.8, refers to the crucial role of city regions, the finalised plan might say more about the importance of collaboration between the Glasgow and Edinburgh city regions. The EU Report on Territorial Cohesion identifies Edinburgh and Glasgow as Metropolitan European Growth Areas (MEGAs) with potential for further development. Research on the geography of the knowledge economy indicates that Glasgow and Edinburgh are strong knowledge economy centres in UK and European terms. Scotland is unusual outside the core area of the European Pentagon in having two such growth centres so close together. That is an attribute on which the Scottish Executive is keen to build.

7. Paragraph 1.13 simply “assumes” that Glasgow and the Clyde Valley will experience growth. As population and household projections depend on this “assumption”, some reference to the justification for it is needed. We note that the projections on which the Agenda for Sustained Growth are based (Technical Report 9/05) depart from the GROS view primarily by adopting a more optimistic assumption about migration. Migration is, of course, a hard variable to measure, and even harder to project. The draft structure plan’s improving migration assumption is derived by fitting a trend line to the recent historic pattern in net within-UK migration (Diagram 2). By contrast, GROS does not attempt to identify a trend line for migration but rather assumes continuation in future at a past average level. Paragraph 1.12 of the draft structure plan refers to out- and in- migration in absolute terms when net terms would be more appropriate. The wording of the paragraph suggests that nobody would ever again migrate out of the area, which is less than realistic.

8. Paragraph 2.2 of Technical Report 9/05 refers to discussions with GROS about the mid-year population estimate for Glasgow City. The figure has been increased by 8,000 on the basis that GROS undercounted by that amount in the Census. It should be noted that GROS does not accept this adjustment and does not intend to amend the mid-year estimate in the light of the discussions which have taken place.

9. Paragraph 1.15 acknowledges that the service sector is likely to make an important contribution to the growth anticipated in Glasgow and the Clyde Valley. Specific reference might be made to the potential of tourism which is growing at 4% per annum globally. Glasgow’s city centre hotel stock has doubled over the last decade and the number of overseas visitors to Scotland increased by 20% last year. Scottish Ministers’ see tourism as an important growth sector and want Scotland to at least match the global growth rate. Reference might also be made to the economic potential of employment related to the protection and management of the environment (paragraph 1.15). The Scottish Executive’s Green Jobs Strategy seeks to ensure that Scotland benefits from the business opportunities arising from the drive towards sustainable development.

10. Paragraph 1.16 of the draft plan refers to recommending transport projects for inclusion in “the National Transport Framework Strategy for Scotland”. The National Transport Strategy will be a policy context document, to be followed by a Strategic Projects Review. Any aspirations for new strategic transport projects should be put forward for consideration in that review.

11. Consideration should be given to the extent to which an agenda for sustained growth can also be regarded as sustainable. The approved structure plan sets out shared targets and guiding principles for sustainable development. Paragraph 1.18 of the consultative draft refers to very substantial investment in infrastructure being required to support the growth of the West of Scotland. There is an apparent tension between the agenda for sustained growth and sustainable development where the growth strategy is predicated upon investment running into billions of pounds. Consideration will also need to be given to the planned pattern of provision of new school accommodation, particularly in areas earmarked for urban expansion.

## **Section 2: Implications for the Metropolitan Development Strategy**

12. The commitment to creating high quality places (paragraph 2.4) is very welcome. The finalised plan might also make reference to the key roles of education and community safety in improving the quality of life and creating successful, competitive places. The quality of architecture and the built environment is an important aspect of the area’s attractiveness to visitors.

13. The intention to re-establish a hierarchy of town centres (para. 2.7) is noted. It would be more appropriate for structure plan to refer to the encouragement of investment in the City Centre being a priority (first bullet of paragraph 2.7), given that the Joint Committee will not itself be the agent of investment. If Ravenscraig is to be identified as a Sub-regional Town Centre, the structure plan should indicate that such centres “will provide a wide range of community, retail and administrative facilities serving more than their local community.” There is a disparity between the 54 town centres identified in Diagram 3 (page 11) and the 53 town centres referred to in the Summary.

14. We welcome the fact that social cohesion will be one of the objectives of the structure plan (paragraph 1.1). As the Scottish Index of Multiple Deprivation demonstrates, the level of deprivation across the conurbation is considerable. However, the extent to which an agenda for growth will assist in tackling these issues and assisting in providing a more equitable distribution of resources is not made clear. The section on Urban Renewal Areas makes no link between economic growth priorities and the needs of priority communities identified in Regeneration Outcome Agreements. The National Planning Framework stresses the need to ensure that disadvantaged communities have access to jobs and opportunities (paras. 88 and 98, NPF).

15. Paragraph 2.10 refers to “the need for a £60 million rolling five-year investment programme” to tackle vacant and derelict land. While the 2004 Spending Review provided a further £24.3 million for the Vacant and Derelict Land Fund for the period 2006-08, it should be noted that Ministers have yet to decide how this money will be allocated.

16. The use of the heading “National Flagship Initiatives” on page 13 is inappropriate. While there is national support for many of the projects, initiatives and assets identified in paragraphs 2.11 and 2.12, according national status is not the prerogative of the Joint Committee.

17. The references to Green Belt policy in paragraph 2.25 appear to prejudge the outcome of the review of Circular 24/85. The Executive expects to issue a draft SPP this summer. The first sentence

of paragraph 2.26 seems a rather convoluted way of saying that Green Belt boundaries will be adjusted to accommodate urban expansion.

18. We note that the draft structure plan proposes no change to the Rural Investment Areas (RIAs) identified in the approved structure plan (paragraph 2.31). Unfortunately, the text in the consultative draft tends to detract from the clear messages provided in the approved structure plan. Also, we are not entirely convinced that paragraphs 2.27 and 2.28 fully reflect the thrust of *SPP15: Planning for Rural Development*, which indicates that planning should be supportive of sustainable development and diversification in rural areas. The approach set out in paragraph 2.29 appears rather top-down and directive and provides no guidance for rural areas which are not RIAs. The National Planning Framework indicates that the future for rural areas lies in economic diversification allied to a commitment to environmental stewardship. It states that the role of planning is to enhance the value of rural resources and help create development opportunities at sustainable locations (para. 170, NPF). It also emphasises the importance of place-making, community empowerment and diversification in the revitalisation of areas which have suffered decline (paras. 105 & 106, NPF).

19. In addition, the 3 actions identified for particular attention in future local plans (transport, affordable housing, and environmental improvement) in paragraph 2.30 have little relationship to the actions identified in the approved structure plan. Most strikingly, the draft plan identifies no action relating to economic regeneration. Economic regeneration is a core element of the 2000 strategy and one which we would have expected to have continued relevance in the new structure plan. Similarly, the approved plan refers to housing quality but makes no mention of affordable housing, yet in the consultative draft affordable housing emerges as a key issue. These significant changes in emphasis are not explained and create uncertainty as to what the final policy on Rural Investment Areas will look like. As the consultative draft states an intention to retain the existing policy, any substantive alterations which emerge in the submitted plan will have to be accompanied by a clear justification.

### Section 3: The Infrastructure of Growth

20. The strong emphasis on creating a Green Network is welcomed. However, it would be helpful if the finalised plan were to adopt a consistent terminology. The consultative draft employs the headings “Greenspace Infrastructure” and “Greenspace Network” but refers to a “Green Network” in the body of the text. The clear emphasis on the opportunities for the regeneration and improvement of vacant and derelict land which the Green Network offers chimes well with the emphasis on regeneration and renewal in other parts of the draft plan, as well as the priorities set out in the National Planning Framework. The draft structure plan recognises the wide range of benefits which green spaces deliver, although recreational, health, and biodiversity benefits could perhaps have been given more attention.

21. We welcome the fact that advice contained in *PAN 65: Planning and Open Space* is reflected in the draft structure plan. For example, there are useful references to the importance of open space management, and several references to the many types of greenspace that contribute to a greenspace network. Cross-cutting issues also come through strongly and are an important consideration in the delivery of the network. While we welcome the recognition of the critical roles of SNH and the Forestry Commission, it should be remembered that there are many other organisations and interests which are important to the delivery of the greenspace network, such as SportScotland, Communities Scotland, and not least local authorities and developers.

22. The reference at paragraph 3.3(iii) should be to the Loch Lomond and the Trossachs *National Park*. It is not clear what is meant by the reference to a “Gateway National Urban Park”. The designation of national facilities is not a matter for the Joint Committee.

23. Overall, the draft structure plan and technical reports provide a great deal of information about the greening agenda and raise some interesting issues, but it is unclear how all this is to be reflected in the finalised plan. Some matters do not appear to have been fully resolved. For example, we are not clear whether the distinction in nomenclature between the “Bishopton Forest Park” and the “Gartloch Community Forest” is intended to convey any difference in the nature or management of the two projects. Is it intended that both should have a community dimension? In addition, the relationship between the package of greening action projects identified on page 22 and the Action Framework for the Indicative Forestry Strategy on page 38 needs to be explained.

24. The scale of development envisaged in the draft structure plan has important implications for transport infrastructure. Public transport networks clearly have an important role to play in improving the accessibility of proposed development schemes, alleviating the commuting pressures which the proposed scale of new housing development will create, and discouraging the use of the strategic trunk road network for short local journeys. However, the concept of a “mass transit network” introduced in paragraph 3.8 is not adequately explained. Glasgow already has the largest suburban rail network outside London, and is well known for its extensive bus network. While mass transit is discussed as including light rail, it would presumably also include the recently publicised aspirations to extend the Subway to other parts of the City and beyond. It would seem that rapid transit is being assessed by Strathclyde Passenger Transport (SPT) with no details of future commitment and no short-term solutions outlined to accommodate the significant amount of housing proposed between 2002-2010. It would appear that Crossrail and the north-south tunnel are not seen as alternatives; both are stated as being necessary. The sheer scale of investment implied is scarcely addressed. There needs to be a much more robust definition of the problems and a full appraisal of options for addressing them.

25. The construction of an additional 112,700 houses by 2017 could have a considerable impact to the trunk road network. The number of houses still to be built within the 2002-2010 period requires clarification given that the figure of 47,800 units quoted in paragraph 4.19 includes both recent completions and the effective land supply. Moreover, the additional housing required for the periods of 2002-2010 and 2010-2017 has not been allocated to Housing Market Areas (HMAs). This information is needed to allow specific and detailed assessments of the implications of the additional housing proposed for each HMA. As the M8/A8(T) is already severely congested, any significant additional development will require to be modelled to determine the potential impact on the trunk road network and identify any mitigation measures which may be necessary (see NPPG 17, PAN 57 and PAN 66: Annex B). There are likely to be significant issues of cumulative impact arising from the scale of development proposed in the draft plan, including the new opportunities within the Clyde Gateway which will impact upon the M80, M8, A74(T) and M74 corridors. An area-wide traffic model should be produced to examine cumulative impacts, identify problem locations and determine the level of mitigation required for the trunk road network to accommodate the envisaged degree of development within the structure plan period.

26. The core trunk road network in the Glasgow conurbation comprises the M8, A8, M80 and A80(T). Paragraph 62 of *NPPG 17: Transport and Planning* states that “direct access on to trunk roads should be avoided as far as practicable”. In addition, Annex A of PAN 66 states in paragraph 10 that “there will always be a presumption against the creation of new accesses onto high-speed trunk roads.” The submitted structure plan should therefore make it clear that there will be no new access to the trunk road network unless it can be shown to be a strategic necessity. Where a new access to a trunk road is being considered within the transport accessibility assessment for a specific land use allocation, full and detailed justification will be required. This is likely to take the form of a development appraisal examining the decision process undertaken in relation to the allocation of a

particular land use, and an appraisal of the transport access options in accordance with Scottish Transport Appraisal Guidance (STAG). This will enable TRNMD to determine whether it is appropriate to consider making an exception to current policy with regard to access in a particular instance.

27. The second bullet of paragraph 3.6 refers to the upgrading of the M8 between junctions 26 and 29. As any alteration to the trunk road network is subject to Scottish Executive approval, the structure plan should state clearly that the Scottish Executive has made no commitment to upgrading the M8 between junctions 26 and 29. It should also be noted that “Shawhead - A725 – Raith” (paragraph 41 and Schedule 1, Technical Report TR 7/05) is not a Scottish Executive commitment. The Scottish Executive is undertaking a design analysis, but there is no Ministerial commitment to construction.

28. While the importance of circumferential traffic movements is acknowledged in para. 3.7, the mass transit corridors identified in Diagram 7 are all very radial. One might have expected the consultative draft to have given some indication of how the issue of circumferential movement is to be addressed. The Central Scotland Corridor Transport Studies may offer some pointers. For example, the Motherwell-Cumbernauld axis might merit a transit corridor approach, if not mass transit.

29. Early engagement with Scottish Water on the water and drainage infrastructure issues (paragraphs 3.9 to 3.14) will be critical to the successful realisation of the development strategy. Scottish Executive planning staff are be happy to attend such discussions where that would be helpful.

30. Paragraph 3.16 makes reference to the work being undertaken by SEPA to map areas of flood risk. These will not only assist in the identification of functional flood plains, but generally in the application of SPP7, including the risk framework. In relation to the fourth sentence of paragraph 3.16, it should be noted that paragraph 42 of SPP 7 indicates that local plans should address the risk of flooding from all sources, even if the development is not located on a flood plain. Risk from coastal flooding and rising ground water may also be relevant considerations.

31. The treatment of flooding in the Scoping and Environment Report is helpful. The report acknowledges that the Clyde and most of its tributaries are prone to flooding and that large areas of the central metropolitan area are at risk. There may be elements of the strategy, for example the Clyde Waterfront, which can only be developed if flood prevention measures are implemented. Even then, such measures cannot eliminate risk entirely. The submitted structure plan will need to indicate how its settlement strategy takes account of the potential risks from flooding (see paragraph 39 of SPP7). It should be noted that paragraph 40 of SPP7 states that if a structure plan strategy can only be developed if flood prevention measures are implemented Scottish Ministers will expect a very thorough justification.

32. Bullet (i) of paragraph 3.17 refers to a requirement on developers only “to *consider* IT infrastructure”, while Schedule 9(D) appears to impose a requirement to make *provision* for ICT network connections. The discrepancy needs to be resolved. We are unsure what is meant by the reference to the “national IT network” in the bullet (ii) of paragraph 3.17. Does this simply mean access to telecommunications infrastructure?

33. As far as waste management is concerned, the key spatial challenge arises not from biodegradable waste reduction targets (paragraph 3.18) but from the fact that landfilling is being severely restricted. Many more waste management facilities will be required because the Landfill

Directive requires “reduction of biodegradable municipal waste disposed of to landfill by 25% (of 1995 amounts) by 2010, 50% by 2013 and 65% by 2020.”

34. The finalised structure plan should say more about the Area Waste Plan, waste arisings in the Glasgow and the Clyde Valley area, and current waste infrastructure. It should explicitly acknowledge the requirements which the Area Waste Plan identifies for clean materials recycling facilities (MRFs), mixed waste processing facilities (MWPFs), composters and further waste management capacity increases to 2013 and 2020. It should indicate the timescales for deciding on new infrastructure, taking planning decisions and building the infrastructure; and the criteria which will be used to identify sites. You may wish to refer to paragraphs 22 to 52 of *PAN 63: Waste Management Planning* and the ODPM Research Report *Planning for Waste Management Facilities*.

35. In the last sentence of paragraph 3.18, the reference should presumably be to Schedule 9(B)(vii). However, given that the National Waste Plan does not provide explicit spatial or locational guidance, it may be more appropriate to include a criterion relating to waste management in the schedule concerned with the assessment of demand (Schedule 9(A)) rather than the schedule concerned with locational suitability (Schedule 9(B)). The additional criterion in Schedule 9(A) might read:

“(iv) contribute to the development of the waste management hierarchy defined in the National Waste Strategy and the implementation of the Glasgow and the Clyde Valley Area Waste Plan.”

#### **Section 4: Implications for the Development Frameworks of the Plan**

36. Paragraph 4.3 refers to North Lanarkshire Council’s support for the development of an employment location at the Douglas Support Estate. The proposed location lies at the junction of the A8 and A725, two of Scotland’s busiest trunk roads. The Scottish Executive considers any development at the Douglas Support Estate prior to the identification of a scheme for the upgrading of the A8 to be premature.

37. We note the proposals for the rationalisation of the list of nationally safeguarded inward investment locations (paragraph 4.4) and would wish to be assured that this been agreed with the Enterprise network.

38. We welcome the attention given to the advice in the Planning Advice Note on Affordable Housing (PAN 74) and the recognition role of Local Housing Strategies. Discussions in which Communities Scotland has been involved suggest that local authorities are willing to consider the development of a consistent housing needs methodology to provide a conurbation-wide assessment of affordable housing requirements. Recognition of the need for greater synergy between the planning and housing processes is welcome. The agenda for sustained growth is likely to make the effective joint working between land use planning and local housing strategies more critical. The reference in paragraph 4.22 to the need to give consideration to house type and tenure through masterplanning associated with urban expansion reinforces the need to ensure that local housing strategies are able to assist in delivering mixed communities with appropriate levels of affordable housing. Reference might also be made to the importance of ensuring that new housing is sustainable in terms of energy efficiency and adaptability.

39. We welcome the recognition given to the level of restructuring that may be required in the social rented sector. It is important to acknowledge that social housing issues extend beyond concerns around numbers to matters such as quality, size, type, location and client group.

40. In its comments on the discussion document, Communities Scotland made reference to the need to clarify the statement that “The update of the housing needs suggests that the scale of required restructuring is greater than is currently reflected in current housing programmes”. We note that the same sentence occurs in paragraph 4.23 of the consultative draft and reiterate the need to ensure that this statement is clarified and any implications for the development framework explained in the finalised plan.

41. There is nothing in the proposals for town centres and retailing (paragraphs 4.42 to 4.28) which poses any difficulties in relation to national planning policy. The submitted plan should include a clear statement about the status of existing out-of-centre retail locations in general and Braehead in particular. The National Planning Framework draws attention to the need to realise the potential offered by Motherwell’s location on the West Coast main rail line (para. 155, NPF).

42. We consider that the historic environment interest is satisfactorily covered by Strategic Policy 7 and note that there is no intention to amend that policy. Strategic Policy 7 recognises the international significance of the Antonine Wall and in 2003 Scottish Ministers announced that Scotland will be proposing the Antonine Wall as a World Heritage Site as part of a wider international initiative encompassing all the frontiers of the Roman Empire. Historic Scotland is currently engaged in drawing up the nomination documents with a view to lodging them with UNESCO in 2007. A booklet about the nomination is enclosed.

43. While the preparation of an Action Framework to promote the implementation of the Indicative Forestry Strategy (para. 4.32) is welcome, in 2002 the IFS was presented as an “interim” strategy pending the preparation of a Framework for the Sustainable Development of Natural Resources. Against that background, the treatment of nature conservation, landscape and biodiversity interests in the consultative draft seems rather cursory. It would appear to be assumed that the forestry/woodlands and green networks programme will adequately safeguard and promote these interests. The finalised Plan will need to be explicit about how natural heritage is to be safeguarded.

44. The proposed presumption against major windfarm development outwith the areas of potential identified in the draft structure plan is contrary to national planning policy. While NPPG 6 encourages the identification of areas of search, it makes clear that this should be done in a way that does not preclude development outwith such areas (see paragraph 47, NPPG 6). Paragraph 49 of NPPG 6 provides scope for plans to indicate whether there are “areas or sites which, after appropriate assessment and wide consultation, it is judged that for overriding environmental reasons, proposals for renewable energy development would only be considered in exceptional circumstances”, but the consultative draft clearly goes significantly beyond that. In addition, while we have not seen the final version of the landscape assessment study which has informed the review of windfarm policy, the 3km buffer zone proposed around communities (Map 3, Technical Report 11/05) appears over-cautious. The boundaries of the areas identified as having potential for major windfarm development are very sharply defined in Diagram 11. Such areas might be better represented with a blurred edges.

45. We are puzzled by the statement in the fourth bullet of para. 4.35 that “the immediate needs to meet the renewables obligation will have been met through the implementation of current consents”. The renewables obligation does not impose any requirements in relation to the physical development which may occur in response to the incentive it creates. The Executive’s 2010 renewables target may have been the intended reference. The reference in the final bullet of para. 4.35 should presumably be to “Schedule 9(D)”.

## Scoping and Environment Report

46. While the Consultation Authorities have commented in detail on the Scoping and Environment Report in correspondence forwarded under cover of William Carlin's letter of 15<sup>th</sup> June, some additional comments are set out below.

47. We are surprised that the section of the Scoping Report dealing with the relationship of the 2005 Structure Plan to other plans, policies and programmes (paragraphs 42 to 46) and the text on the national policy context (paragraph 65) make no reference to the National Planning Framework. The only reference to the National Planning Framework appears to be at paragraph 102.

48. The National Planning Framework provides an important context for the increased emphasis on urban renewal and greening. For example, the Framework identifies the Clyde Waterfront and Clyde Gateway as areas of major change where co-ordinated action is needed in the national interest (paras. 146, 151 and 154, NPF). It stresses that major urban regeneration projects offer strategic opportunities to improve landscape quality and repair past damage (para. 94, NPF). It points out that the restoration of vacant and derelict land, former mineral workings and landfill sites provides opportunities for improving the environment and increasing biodiversity through the development of green networks and the expansion of urban, amenity and community woodlands (para. 95, NPF).

49. We are unaware of any proposal to create a National Park in the Campsie Fells (paragraph 155).

50. We question the statement that the only additional positive impact of the structure plan on biodiversity which can be expected is the promotion of more extensive woodland habitats (paragraph 169). We would expect the development of the green network and the major improvements in landscape structure and land drainage envisaged for areas like the Clyde Gateway to offer opportunities to enrich biodiversity across a wide range of habitat types.

51. The reference at paragraph 187 should be to the "Firth of Clyde". The reference in the second sentence of paragraph 196 should be to the "Firth" rather than the "Estuary".

52. The intention to redress the east-west imbalance in greenspace provision (paragraph 207) is welcome.

53. We do not consider that the Executive's policy in relation to windfarm development can accurately be characterised as "laissez faire" (paragraph 232). National planning policy in relation to windfarm developments is clearly set out in National Planning Policy Guideline on *Renewable Energy Developments* (NPPG 6). The guiding principles for considering renewable energy developments set out in NPPG 6 stress the importance of meeting international and national statutory obligations to protect designated areas, natural heritage and the historic environment, and minimising effects on local communities (para. 17). National planning policy provides no support for "approving windfarm proposals regardless of their impacts" (paragraph 236). The Joint Committee's own Wind Energy Issues Report acknowledges that NPPG 6 indicates that the planning system should take a positive approach to renewable energy developments, whilst protecting sensitive environments.

54. The development of the green network might be expected to have a beneficial impact on air quality (paragraph 265).

## Appendices

55. The reference in the first sentence of Schedule 9(A) should presumably be to “Schedule 9(D)”. We question whether the use of the adjective “speculative” in relation to office development is relevant in Schedule 9(D).

56. I hope the above comments are helpful and look forward to the submission of the final Plan. I would, of course, be happy to meet with you to clarify and discuss any matters raised in this letter if you would find that helpful.

Yours sincerely

Graeme Purves  
Principal Planner

