

GLASGOW AND THE CLYDE VALLEY STRUCTURE PLAN THIRD ALTERATION REASONS FOR NOT MAKING MODIFICATIONS

Introduction

1. Many representations made on the Plan are addressed either wholly or in part by Scottish Ministers' final modifications. The following commentary summarises representations made in respect of which Scottish Ministers have decided not to make modifications and gives reasons for their decision. The commentary covers both representations made on the Plan as submitted and on Scottish Ministers draft modifications. It follows the sections and policy contents sequence of the Written Statement.

Whole Plan and Section A – Context

2. The strategy does not provide an adequate or flexible short or long term framework for development to accommodate change, particularly for housing. It is too complex. (Elphinstone Land, Homes for Scotland)

Reason: The Alteration identifies a range of goals based on high growth assumptions and is therefore flexible while providing structure and certainty.

Section B – Framing the Strategy

3. A 33% uptake of brownfield land is not realistic and is subject to reduced funding by the enterprise network and the changing role of Communities Scotland. Range and choice of homes is not reflected in the principles applying to development choices and strategic policy. (Dawn Homes, Homes for Scotland, Elphinstone Land)

Reason: The Plan is strongly committed to brownfield development. The enterprise network and responsibilities of Communities Scotland have also been restructured by Scottish Government since those comments were made. Supply is the strategic issue, with range and choice dealt with by policies 9 and 10.

4. Designation of Bishopton as a Community Growth Area (CGA) is contrary to the guiding principles of sustainable development. Examination in Public (EiP) remit was constrained, inadequate and excluded consideration of matters covered for other CGAs. (named individuals, Bishopton Action Group)

Reason: Scottish Ministers' remit for the EiP focused on the additional information they required on contamination and transport. Scottish Ministers have accepted the Bishopton EiP report and endorsed the Alteration's proposals for Bishopton.

Section C

Strategic Policy 1 - Strategic Development Locations

5. Risk of effects on climate change, green belt incursions and infrastructure overload from CGAs, particularly at Carluke, based on low density assumptions.

Developers thought further CGAs should be identified or alternative sites provided. A full green belt review should be carried out. (Jackton and Thorntonhall Community Council and others; Dawn Homes, Taylor Woodrow) CGAs do not address air quality ambitions, household growth, the brownfield strategy, green belt pressures or quality of life. (named individual)

Reason: CGAs were chosen as set out in Technical Report TR6/06. The plan contains strong guiding principles for sustainable development. Developers did not specify location of alternative CGAs. The Alteration does not involve a comprehensive review of the strategy, including green belt.

6. Insufficient land identified in Glasgow for the strategic issue of family housing. (Elphinstone Land).

Reason: It is for Glasgow City Council to determine the mix of house types and the City Plan provides for greenfield release, new neighbourhoods and 3 CGAs.

7. Pleas from developers to include or change detail on specific or small sites or infrastructure to support release of future development locations not identified by the Alteration. (Banks Developments, George Wimpey, MJH West, Mctaggart and Mickel, Miller Homes, Cala Homes, Caledonian Properties Ltd, Stewart Milne Holdings, London Merchant Securities, Tom McCabe MSP, named individual, Cala Homes (West) Ltd), Barrance Farm LLP)

Reason: The allocation of specific sites is a local plan matter. Reasons for excluding some sites are set out in the Alteration's Technical Reports. Current developer-led applications are matters for the planning authority.

8. Port Glasgow and East Kilbride should be recognised as renewal priorities. (J.J.Gallagher, Scottish Retail Property Ltd Partnership) Ravenscraig should not be identified as a town centre. (Standard Life Investments) Braehead should be identified as a town centre or commercial centre. (Capital Shopping Centres, Renfrewshire Council) Linwood should be designated a town centre. (Tesco) Commercial centres should be identified by the Alteration. (Tesco) Glasgow should be accorded a separate regional status in the schedule of town centres. (Buchanan Partnership)

Reasons: Greenock is identified for urban renewal with Port Glasgow town centre safeguarded. East Kilbride town centre renewal has been approved. Ravenscraig's status was resolved with the approval of the structure plan first Alteration. Braehead lacks town centre diversity. The case for commercial centre status at Braehead should be addressed by the Joint Committee in its consideration of retail issues. Linwood is identified as a secondary centre in the adopted local plan. The Alteration identifies the measures required to maintain strategic focus on Glasgow.

9. CGA requirements should include assessment of local road networks. (Bishopton Action Group) Additionally, decontamination processes should be augmented, defined and specified. (named individuals, Bishopton Community Council, Bishopton Action Group) The identification of Bishopton ROF was specific and inappropriate for a structure plan. (Bishopton Action Group)

Reason: The Alteration addresses consideration of approved access strategies and satisfactory treatment requirements. The pre-application consultation stage of the development management process will apply. It was appropriate to identify a very large previously developed accessible site in need of remediation in the Alteration.

10. Detail on transport improvement funding at Bishopton should have been specified to constrain the approval of the masterplan and housing development. If problems not resolved within 5 years Bishopton's CGA status should be removed from the Plan. (Bishopton Action Group) On the other hand it was felt that the strategy was blurred by comments on infrastructure investment. (CASS Associates)

Reason: The decision letter on the Alteration makes it clear that approval of the Alteration implies no commitment to grant or capital expenditure. Approval of planning applications is in the first instance a matter for the planning authority. Removal of CGA status would affect medium to long term potential. It is reasonable for a spatial strategy to indicate the prioritisation of transport investment.

Strategic Policy 2 - Long term potential for development

11. Bishopton will deliver fewer than 1,000 units by 2018 therefore the plan is too optimistic. (Dawn Homes)

Reason: The Plan's housing land supply will be monitored routinely.

12. Bishopton Community Forest Park has been downgraded to woodland park by Forestry Commission. (named individuals, Bishopton Action Group) Extent of green network in diagram 8 around Bishopton is misleading. (Bishopton Action Group)

Reason: No such downgrading has occurred. Diagram 8 is schematic only.

13. Presumption against isolated and sporadic development on previously developed land is inconsistent with a liberal approach to low impact rural development as per SPP 15. Reserve land should be identified for housing for the long term, over and above the CGAs. (Warren Consultants, Homes for Scotland)

Reason: SPP 15 supports the maintenance of restrictions within green belts. Greenock/Port Glasgow and the A8/M8 corridor (Newhouse-Bargeddie) are identified for the longer term.

Section D

Strategic Policy 5 - Competitive Economic Framework

14. Housing not recognised as a means of economic regeneration. (Elphinstone Land)

Reason: This section of the Plan is focussed on employment generation from which the house building industry can benefit.

15. A 5-10 hectare greenfield industrial land release should be identified for East Renfrewshire. (named individual)

Reason: This is neither supported by the level of local plan supply, the focus on brownfield development, nor Technical Report TR3/06.

Strategic Policy 6 - Quality of Life and Health of Local Communities

16. Housing targets should be increased to include new areas e.g. to reflect Housing Supply Task Force proposals. More flexibility needed to ensure capacity for development sites can be brought forward to overcome 5-year effective land supply constraints, brownfield site risks, limited choice, infrastructure and implementation issues and the 2011-2018 period to account for public sector housing re-provisioning. Loss of families from Glasgow is evidence of supply shortage. Greenfield release has underperformed on the delivery of housing. (Banks Development, Dawn Homes, George Wimpey, Homes for Scotland, Elphinstone Land)

Reason: The Alteration's additional supply is based on a high growth scenario, taking forward the brownfield strategy supplemented by the potential of the CGAs. Re-provisioning is addressed in recently adopted local plans and strategic policy 2. SPP 3 allows land to be brought forward in advance of local plan adoption. HSTF is looking at all constraints. Scottish Government encourages infrastructure providers to work together more effectively. Brownfield strategy is consistent with Scottish Planning Policy and CGAs will complement brownfield supply and offer choice. Glasgow City Plan addresses family housing through greenfield release, New Neighbourhoods Initiative and 3 CGAs. Planning is not the only factor in underperformance.

17. A more enabling affordable housing policy is required e.g. for Renfrewshire villages. (Murray Tosh MSP) Affordable housing not sufficiently addressed or flawed. (Mactaggart and Mickel, named individual, Elphinstone Land, Homes for Scotland) Allocating sites for 100% affordable housing is inconsistent with SPP 3. (George Wimpey) Targets unrealistic. (Elphinstone Land) Scottish Ministers should provide a strategic housing land requirement for East Renfrewshire to improve range and choice. (Mactaggart and Mickel, named individual)

Reason: Besides the areas identified as having an affordable housing need, the Alteration provides scope to address emerging local pressures. The alleged deficiency is not specified. Affordable housing priorities are based on reasoning set out in Technical Report TR 1/06. The consultative draft of SPP 3 is revisiting the relationship between local housing strategies and the development plan. PAN 74 explains development plan roles and the nature of affordable housing contributions. A single greenfield release intervention in E Renfrewshire would not be justified.

18. Town centre policy is not linked to the long term, household growth rates or to a strategy to arrest failure. Social inclusion, health, regeneration and lack of sites should allow for more localised provision. Retail Capacity Analysis technique disputed. Sub-divided retail format should not be sought. The additional retailing opportunities identified are extremely limited. (ASDA)

Reason: The Joint Committee's retail focus group continually monitors the structure plan. SPP 8 supports the sequential approach for retailing developments. The Scottish Government has published research on retailing methodologies. The identified floorspace is drawn from Technical Report TR 7/06.

19. Greenock merits additional retailing floorspace. (Oak Mall Greenock Ltd.) Growth in expenditure is underestimated. (Muir Smith Evans) Further small store format opportunities exist across the conurbation. (ASDA) Proposals at Glasgow Harbour should be identified in the Alteration as an Additional Retailing Opportunity (Glasgow Harbour Ltd) The additional floorspace allocated to Kirkintilloch is unjustified. (London Merchant Securities) St Rollox should be identified as commercial centre. (Tesco). The Ravenscraig Additional Retailing Opportunity is not specified. (Standard Life Investments)

Reason: Greenock town centre is identified as a renewal priority. No evidence of underestimate provided. Small store provision is a local plan matter. Strategic requirements for the Glasgow NW/Clydebank catchment and Kirkintilloch are identified in Technical Report TR 7/06. Any change in the status of St Rollox is a matter for the Joint Committee. Ravenscraig catchment not yet built.

20. Opportunities for securing regeneration and community benefits by addressing qualitative retail deficiencies are either not identified or are underestimated by Technical Report TR 7/06. (Morrison Supermarkets, Capital Shopping Centres, Tesco, Hercules Trust)

Reason: This is addressed by Schedule 6(c)(i) and local plans. Retail issues are monitored by the Retail Focus Group.

Strategic Policy 7 - Strategic Environmental Resources

21. Strategic environmental resources are not treated consistently. (Scottish Natural Heritage) River environment and salmon and freshwater fisheries are not addressed. (named individual). Agricultural land classified below grade 3.1 is over-protected. (Warren Consultants)

Reason: The environmental resources policy, schedule and paragraph 13.3 are consistent. The Plan considers water catchments and its approach to river basin management and individual development management decisions can consider this issue. Grade 3.2 is average arable land capable of producing a moderate range of crops. No justification for deletion as a strategic environmental resource.

Strategic Policy 8 - Sustainable development of natural resources

22. Areas of search for windfarms too restrictive. Developers are best placed to identify sites. (West Coast Energy, RDC Scotland Ltd, ScottishPower Renewables) Proposals for windfarms should not be determined on the basis of grid capacity (ScottishPower Renewables) Potential areas of search for windfarms adjoining Muirkirk and Lowther Hills SPA should be removed. (Ayrshire Joint Structure Plan and Transportation Committee)

Reason: The spatial policy is consistent with SPP 6 Renewable Energy.

23. The plan does not include small renewables for new developments. (British Wind Energy Assoc., Warren Consultants)

Reason: Micro-renewables are covered in the Annex to PAN 45 and PAN 84 has now been published with a focus on local policy development. Strategic policy 9 covers energy conservation.

Section E Local Plan implications

24. The priorities for local plan review should be time limited. (Dawn Homes, Homes for Scotland)

Reason: Prejudges proposals for the Scottish Government's reform of development planning.

25. Object to modification 63 deleting regard for "other material considerations". (Glasgow and the Clyde Valley Structure Plan Joint Committee)

Reason: Material considerations are in addition to development plan (section 25 of the Town and Country Planning (Scotland) Act 1997).

Strategic Policy 9 - Assessment of development proposals

26. Policy does not address national renewable energy targets. (West Coast Energy, RDC Scotland Ltd.)

Reason: The targets are not apportioned regionally by SPP 6.

27. Range of developer contributions exceed remit of Circular 12/1996 or implies all borne by developer. (ASDA, Warren Consultants)

Reason: The criteria only apply where relevant to the application.

Schedule 9 – Scales of Development likely to be significant

28. 10 or more housing units is too low a threshold of strategic significance. It should be 50 houses – later revised to 100 houses (major) in light of Scottish Government consultation on Planning Hierarchy. (Dawn Homes, Homes for Scotland)

Reason: 10 houses on greenfield sites as specified is appropriate in view of potential impact in non-allocated areas. 100 house threshold for major development has been set to promote efficient processing rather than as an indicator of strategic significance.

29. Schedule 9 should refer to Retail Developments outside Town centres. (Robert Drysdale Planning Consultancy).

Reason: Proposed modification 67 was deleted and the Joint Committee should consider the range of centres that merit strategic protection in taking its next steps following consultation on the 2007 Town Centres and Retail Issues report.

30. 20MW is too low a threshold of significance for windfarms. (named individual, ScottishPower Renewables) 20MW threshold is arbitrary. (West Coast Energy RDC Scotland Ltd, British Wind Energy Association) Only schemes above 20MW outside the potential areas should be assessed against strategic policy 9. (G M Mining)

Reason: The Alteration is now consistent with SPP 6. Strategic policy 9 is plan-wide, not selective.

Strategic Policy 10 - Departures from the structure plan

31. Object to deletion of reference to “other material considerations”. (Glasgow and the Clyde Valley Structure Plan Joint Committee)

Reason: Material considerations are in addition to development plan (section 25 of the Town and Country Planning (Scotland) Act 1997).

32. The departures policy requires evidence of housing shortfalls which impact on range and choice. (George Wimpey) A minimum 5 year supply criterion should be added. (Homes for Scotland)

Reason: The Alteration is a planned approach to housing consistent with the high growth scenario. SPP 3 requires local plans to provide effective 5 year supply.

33. Policy identifies qualitative retail deficiency as a structure plan departure. (ASDA) Qualitative retail deficiencies and locational need could be addressed by strategic policy 9 and schedule 6(c)(i). (Morrison Supermarkets)

Reason: Fails to recognise that this criterion may render a departure acceptable. Strategic policy 9 is clear about the criteria that must first be met by retail development proposals, which include qualitative deficiency. Strategic policy 10 is a test based on need and scale, not an absolute exclusion.

Appendix 1

34. Settlement strategy should be 20 years as per SPP 3.

Reason: This is an Alteration taking account of revised economic forecasts, not a fully revised plan.